

*Indonesian Journal of Agrarian Law*  
ISSN: 3110-6633 (Online)  
Vol. 3 Issue 2 (2026) 728-765  
DOI: <https://doi.org/10.15294/jal.v3i1.42223>  
Available online since: March 11, 2026



## Letter C-Based Land Rights Verification in the Implementation of PTSL in Patemon Village

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### Abstract

According to Article 19 of Law Number 5 of 1960 regarding the Primary Agrarian Laws (UUPA), land registration is an important tool for guaranteeing legal certainty and giving protection to land tenure. In the process of land registration, including the CSLR Programme (Complete Systematic Land Registration), the way of proving ownership on unregistered land is by reference to village administrative records (Letter C). This research will examine the validity of using Letter C in proving land ownership for the purposes of CSLR in Patemon Village, along with identifying issues and solutions to registering land in this manner. The research used is of a normative legal nature, using a Legislative Approach, supported by empirical studies involving case studies, and interviews with both village officials and the Land Office. The findings showed that although Letter C is not the same as

Land Certificate, it can be utilised as an identity (basis / title) for land ownership and can be added with additional documentation and needed to be confirmed by the relevant authorities for first-time registrations. Letter C is currently accepted as proof of land ownership in Patemon for the CSLR programme.

## Keywords

*Letter C, Complete Systematic Land Registration (CSLR), Legal Certainty.*

## A. Introduction

The benefits of land registration are many and continue to increase as society develops additional opportunities for its economy, its socio-economic functions, its political functions, its cultural functions, and so on. Historically, land has always represented a form of protection (security) and a source of sustenance (food), which is why people refer to their house as their home<sup>1</sup>. In modern society, however, Land encompasses more than simply providing basic survival needs; it now serves numerous purposes, both economically and socially, and is used for many different purposes. Therefore, the value of Land is determined not solely by Location, but by the combined amount of all uses and types of Uses that it supports. While there are many different uses of Land, all uses need a coordinated approach, as well as a consistent manner in terms of how the Land is managed<sup>2</sup>.

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<sup>1</sup> Nurmala, Ranti Diva, And Temmy Fitriah Alfiany. "Analisis Dan Implimentasi Sertifikat Ganda Hak Milik Atas Tanah Berdasarkan Pasal 19 Uupa Dalam Perspektif Hukum Perdata." Indonesian Journal Of Law And Justice 2, No. 1 (2024): 1–10. <https://doi.org/10.47134/ljij.V2i1.3096>.

<sup>2</sup> Nathania, Nanda Riesta, Zakiya Az Zikra Ismail, And M. Rivatul Ulum. "Solusi Mengatasi Krisis Tanah Dan Pentingnya Pendaftaran Tanah Di Indonesia Dalam Mewujudkan Kepastian Hukum." Management Economics Trade And Accounting Journal (Meta Journal 2, No. 2 (2024): 45–52. <https://doi.org/10.36722/Jmih.V2i2.744>.

Land registration is typically conducted to achieve legal certainty. The Basic Agrarian Law (UUPA) serves to provide legal certainty regarding the objective that land rights are held by Indonesian citizens. This is explicitly regulated in Article 19 of the UUPA, which states that<sup>3</sup>:

- (1) To ensure legal certainty, the government will conduct land registration across all regions of the republic of indonesia in accordance with the provisions outlined in the government regulation.
- (2) The registration specified in this article will include the following activities:
  - a) Surveys, maps and record land
  - b) Register rights to land and/or the transfer of rights to land
  - c) Issue certificates to land, which act as physical proof of ownership.
- (3) Land Registration must be conducted after carefully evaluating and determining the current state and social conditions and needs of individuals and businesses in terms of their socio-economic activity and the degree of effort it will take to register land as directed by the Minister of Agrarian Affairs.

The term “cadastre” refers to land registration. Cadastre describes the official records pertaining to the land parcel, its location, and ownership of the land parcel. The term “cadastre” has its origins in Latin and derives from the Latin word *capistratum*, which means a ‘register’ or ‘unit’ for taxation purposes during the Roman Empire. A cadastre consists of records specifying the area name and its owner; it also identifies the area’s value and what rights the owner has over that area.

As a government administrative function, Land Registration involves legislation to establish the status of

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<sup>3</sup> Nathania, Nanda Riesta, Zakiya Az Zikra Ismail, And M. Rivatul Ulum. “Solusi Mengatasi Krisis Tanah Dan Pentingnya Pendaftaran Tanah Di Indonesia Dalam Mewujudkan Kepastian Hukum.” *Management Economics Trade And Accounting Journal (Meta Journal* 2, No. 2 (2024): 45–52. <https://doi.org/10.36722/Jmih.V2i2.744>.

each property as a legal object and identify the owner. under the agrarian principles (UUPA), all land must be issued a clearly defined status and an identified owner in order to be validly held. ownership rights, for instance, are a type of ownership rights created by the state; state-owned land, and land subject to use and cultivation rights are also included in enabling acts. consequently, all land and land rights, whether right of ownership or other rights, are mandatory to be registered at the land office (BPN)<sup>4</sup>.

Land registration is described as a sequence of activities performed by the authority on an ongoing basis and in a judicious manner. It involves the identification of specific data on real estate that relates to the establishment, recording, and preservation of evidence that can be presented to individuals, while being able to provide an assurance of legal certainty in the realm of real estate affairs, by giving the right to have that evidence kept and maintained. Land registration is done in the format of land certificates. This is also in accordance with article one, point one of the Indonesian government's regulation number twenty-four of nineteen ninety-seven regarding real estate registration, which states that the act of registering real estate is a series of actions carried out by the authority in a continuous, sustained, and consistent manner<sup>5</sup>. The activities of registering real estate consist of collecting, processing, recording, displaying, and maintaining the physical and legal records of real estate and apartments using maps and lists, as well as issuing evidence of the right to possess the appropriate documentation for real estate and certain interests in real estate. Land registration is part of agrarian law, as stated in article nineteen of UUP, but was further carried out through government regulations number twenty-four of nineteen ninety- seven; in addition, these same government regulations will govern real estate registration.

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<sup>4</sup> Ningrum Ambarsari And Noor Azizah, "Urgensi Pendaftaran Pada Tanah Yang Belum Bersertifikat," *Al'adl* 10, No. 1 (2019): 91–102.

<sup>5</sup> Nurwanti, Yulian Dwi. "Pembagian Kepemilikan Tanah Yang Berkeadilan Sosial Berbasis Transendental." *Prosiding Seminar Nasional Program Doktor Ilmu Hukum*, 2024, 85–92.

Through article three, land registration will be developed<sup>6</sup>.

Section 1 of Article 19 of the UUPA and Government Regulation No. 24 of 1997 defines a Land Registration Process that provides the following benefits:

"A Land Certificate is Evidence Of Legal Rights And Protection Of Those Rights" that allows Owners To Easily Demonstrate And Prove Their Rights; Article 19 supports our understanding that" A Land Certificate provides the strongest and most conclusive Evidence of Ownership / Control of Real Property". The UUPA and Government Regulation describe the process of Land Registration as follows<sup>7</sup>:

- a) Through Surveys, Maps and Records Of Land;
- b) Registration Of Land Rights And Transfers Of Land Rights
- c) Issuance Of Certificates To Support Claims/Claims Made By Owners Of Property.

According Harsono to provide guarantees and Legal Certainty for Agrarian Rights to Land in Indonesia, the three points described above are the methods by which government implements its policies relating to agrarian rights. Each of the three points is essential in recognising that each community member is the owner of a variety of agrarian rights; these rights consist of the entire hierarchy of rights to land, including rights to land (as to how land can be used), wakaf/ endowments (for perpetual use), mortgages or security rights (in respect to a debt) and communal ownership of land (as represented in the building by the structure of the communal ownership rights in apartment buildings)<sup>8</sup>. Land registration objectives are sometimes

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<sup>6</sup> Saputro, Ridwan Alfi. "Pembuktian Penguasaan Hak Atas Tanah Untuk Pengajuan Pendaftaran Tanah Sistematis Lengkap (Ptsl) Di Kelurahan Kalibata Rw 05 Tahun 2019-2020 Berdasarkan Pp Nomor 24 Tahun 1997." *Al-Zayn: Jurnal Ilmu Sosial & Hukum* 3, No. 4 (2025): 3971–78.

<sup>7</sup> Rosifah, Risma, Rudi Zulfikar, And Agus Sholikhhan Yulianto. "Pengaruh Struktur Kepemilikan Terhadap Financial Distress Serta Implikasinya Kepada Manajemen Laba" 6, No. 2 (2023).

<sup>8</sup> Rosifah, Risma, Rudi Zulfikar, And Agus Sholikhhan Yulianto. "Pengaruh Struktur Kepemilikan Terhadap Financial Distress Serta Implikasinya Kepada Manajemen Laba" 6, No. 2 (2023).

referred to as "land administration" and can be found in article 3 (the objectives) of government regulation number 24 of 1997. The primary purposes of land registration include creating the basis for recognition of and legal certainty for everyone who holds an agrarian right to land and providing protection of their land rights based on the parcel(s) of land they own and their status as the holder(s) of land rights is enabling the holder(s) of their respective land rights to prove their holder status and facilitating the orderly performance of the activities of the various bodies of the government and other entities with respect to land<sup>9</sup>.

In response to the increasing need for government services and the improvements to the public land system, the government has now released government regulation 18 of 2021, which will become the implementing regulation of law no. 11 of 2020 (the Job Creation Act). government regulation 18 of 2021 provides additional guidance from this law, as well as details about how the government plans to implement its national strategic policies outlined within law no. 11 of 2020<sup>10</sup>.

The first action undertaken by the Government Regulation No. 18/2021 is to eliminate provisions that were originally included under the job creation law via pp no. 24/1997 regarding land registration and pp no. 103/2015 regarding the ownership of residential properties by foreigners in indonesia and pp no. 40/1996 regarding cultivation rights (HGU), building rights, and use rights, provided by prior pp's; furthermore, it has made amendments to several other laws regarding the right of management as described under pp no. 8/1953 regarding control over state lands. additionally, this pp also creates new legislation relating to the right of management, new land rights,

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<sup>9</sup> Saputro, Ridwan Alfi. "Pembuktian Penguasaan Hak Atas Tanah Untuk Pengajuan Pendaftaran Tanah Sistematis Lengkap (Ptsl) Di Kelurahan Kalibata Rw 05 Tahun 2019-2020 Berdasarkan Pp Nomor 24 Tahun 1997." *Al-Zayn: Jurnal Ilmu Sosial & Hukum* 3, No. 4 (2025): 3971–78.

<sup>10</sup> Sibuea, Harris Yonatan Parmahan. "Arti Penting Pendaftaran Tanah Untuk Pertama Kali." *Negara Hukum: Membangun Hukum Untuk Keadilan Dan Kesejahteraan* 2, No. 2 (2011): 287–306.

apartment units, and land registration. One of the new areas identified within this PP is sub-surface and/or over-surface land ownership which will allow the creation of such sub-surface/over-surface rights as the Above-Ground Space Rights and The Underground Space Rights. As per this Regulation, the definition of land includes all land on the surface of the globe (including all water), but also includes both above ground and below ground (sub-surface) but only to the extent of the potential use for each<sup>11</sup>.

Above-ground Space and below-ground space is defined as land on the planet earth which is free to hold ownership/control apart from the actual physical presence of water, trees and animals above / below it. The concept of "Space" and how it is defined can be located in Government Regulation No. 18 2021 (PP 18 2021). The government regulations provide an overview of the way the right to manage a property (space) can be created and assigned along with a comprehensive list of all the types of methods that are available to create and assign the right to manage space in regard to the creation of the legal right and methods used to give title to a property. the government rules also identify how a right to manage a property can be created/assigned in the interest of another (i.e. through the creation of an easement, creating a lease agreement, creating a sale of property, etc.) and what types of documents will be used to establish the legal right to create/assign a right to manage a property (space) when that property (space) is registered with the appropriate land office registry. this regulation establishes all property<sup>12</sup>.

Title assignments by registering property titles, creates the right to manage property on behalf of another, provides

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<sup>11</sup> Aslinda, Andi, Nur Asyifa T, Andi Cudai Nur, Program Studi, Ilmu Administrasi Negara, And Jurusan Ilmu Administrasi. 2024. "Implementation Program For Complete Systemic Land Registration (Ptl) For Acceleration Of Land Registration At Makassar Land Office." *Jurnal Aktor* 4 (1): 2808–5167.

<sup>12</sup> Sibuea, Harris Yonatan Parmahan. "Arti Penting Pendaftaran Tanah Untuk Pertama Kali." *Negara Hukum: Membangun Hukum Untuk Keadilan Dan Kesejahteraan* 2, No. 2 (2011): 287–306.

for ownership and access to property by persons holding the right to manage, and defines the rights associated with the management of property (space) above/below a property parcel. The new property system is a system that allows a person to establish/maintain or transfer an established right to manage a respective parcel (property) through the internet or app/portal at any time during its use and is totally dependent on a registered property title, an identifiable description of the above-ground space (i.e. land) of the parcel still being owned by the owner of the property and 3 their registered real estate brokers as their property manager<sup>13</sup>.

When a land is registered using comprehensive systematic registration of land, it also raises some concerns regarding the manner in which to prove ownership of properties on which the registration is not present yet (i.e., administratively obtained). As an example, if a parcel of land is included on the complete systematic registration of land then the title of that parcel will include a description of all parcels not yet registered/recorded within the complete systematic registration of land's defined geographic area (by village/sub-district or similarly defined).

The letter C is a type of land registration in Indonesia that shows ownership through the village (s) and through the Government Agency (BPN) for all National Land. Just like Certificate of Land A, the letter C has a long history and is part of the Land Administration system [3], existed before the Basic Agrarian Law (UUPA) of 1960, and contains legal information on where and how land is owned or cultivated. The letter C documents were created at the level of the village/sub-district, and contain vital information about the village's records of land ownership, including the parcel number (persil), size (area), class (classification) of land, and the identity of the owner/cultivator. Legally, a letter C cannot be considered valid legal evidence (Sertipikat) for land

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<sup>13</sup> Aslinda, Andi, Nur Asyifa T, Andi Cudai Nur, Program Studi, Ilmu Administrasi Negara, And Jurusan Ilmu Administrasi. 2024. "Implementation Program For Complete Systemic Land Registration (Ptsl) For Acceleration Of Land Registration At Makassar Land Office." *Jurnal Aktor* 4 (1): 2808–5167.

ownership; the only way it can be considered "legal" is as an administrative document for taxation purposes. Despite not being considered legal, the Letter C can still provide evidentiary support (alas hak) or support the first-time registration of land (first time registrasi tanah). The Letter C only contains village (village register) records, and does not have to go through any other formalities.

According to Indonesian Civil Law, an "under-the-hand" sale of land using Letter C is valid between parties. However, Article 23 of the UUPA, along with Article 12 of Government Regulation No 24/1997, requires a formally executed land rights transfer deed from a PPAT to be the only indication of legal land rights. This means that while a Letter C does not have the same status as a land certificate as final evidence of ownership, it serves as a preliminary means to establish ownership for purposes of the CSLR/PTSL Project. The goal of this national program is to provide greater legal clarity regarding informal land tenure and ownership, thereby creating an environment where landowners can receive equitable, transparent and accountable protection of their legal land rights, which will help prevent conflicts over land in the future and support economic development.

Recent research conducted by Saputra (2025) and Mayyasa (2024) suggests that although CSLR represents a major milestone in the history of land registration in Indonesia, the implementation of CSLR presents some challenging obstacles, such as: unorganized or missing letter C records, lack of clarity over property boundaries, and discrepancies in government administrative records. In places such as Patemon, the local government has worked with the community to conduct cadastral surveys and has included neighbors in boundary verification to settle boundary disputes<sup>14</sup>. Despite the challenges faced by the underprivileged due to inadequate communication and the

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<sup>14</sup> Aslinda, Andi, Nur Asyifa T, Andi Cudai Nur, Program Studi, Ilmu Administrasi Negara, And Jurusan Ilmu Administrasi. 2024. "Implementation Program For Complete Systemic Land Registration (Ptsl) For Acceleration Of Land Registration At Makassar Land Office." *Jurnal Aktor* 4 (1): 2808–5167.

need for additional funding to pay for certification, the ability to use a Letter C in conjunction with the active involvement of local authorities and community members remains the primary method of enforcing and providing legal evidence of land ownership<sup>15</sup>.

The Letter C's use is regarded as a form of informal (bawah tangan) contract for goods sale and purchase. Letter C is recognized under Civil Law (Civil Code of Indonesia) as an acceptable method of forming an agreement between two parties, assuming all criteria in Articles 1320 and 1457 of Civil Code are satisfied. In Indonesian National Agrarian Law System and associated Regulations of Law No. 5 of 1960 (UUPA)<sup>16</sup> and Law No. 24 of 1997 (PP 24) relating to land registration, it is required that a document created by a Land Deed Officer (PPAT) is executed prior to transferring an ownership or right. Therefore, although Letter C can be added as a means of supporting other documentation as evidence supporting land registration in the national agrarian law system, it is the weakest form of evidence for establishing ownership (claim<sup>17</sup>). The best and most valid proof of ownership is based on land certificate registration. In an effort to reduce litigation, assist with the processing for land registration requests, and create greater security in regard to land ownership in the country, the government of Indonesia implemented an absolute land registration system (CSLR). The program for legal certainty and transparency in land registration is a programme which aims to provide legal

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<sup>15</sup> Hasirun Adi, Hardyta, Jestino Andre Pratama, And Sultan Kasiawa. 2024. "Persepsi Masyarakat Terhadap Kualitas Pelayanan Program Sertifikat Tanah Lengkap (Ptsl) Di Kota Baubau." *Sosial Dan Humaniora* 3 (5).

<sup>16</sup> Hasirun Adi, Hardyta, Jestino Andre Pratama, And Sultan Kasiawa. 2024. "Persepsi Masyarakat Terhadap Kualitas Pelayanan Program Sertifikat Tanah Lengkap (Ptsl) Di Kota Baubau." *Sosial Dan Humaniora* 3 (5).

<sup>17</sup> Aslinda, Andi, Nur Asyifa T, Andi Cudai Nur, Program Studi, Ilmu Administrasi Negara, And Jurusan Ilmu Administrasi. 2024. "Implementation Program For Complete Systemic Land Registration (Ptsl) For Acceleration Of Land Registration At Makassar Land Office." *Jurnal Aktor* 4 (1): 2808–5167.

certainty regarding an individual's or entity's ownership of land, thereby promoting the welfare of society and creating greater economic opportunity throughout the country by reducing the number of disagreements between people and organisations about land<sup>18</sup>.

In 2025, Ridwan Alfi Saputra completed a research project published in an Al-Zayn journal entitled "The determination of the right of ownership of land using the complete systematic land registration application for the people of kalibata village based on 1997 government regulation No. 24 of 1997". In preparing the research, the author used a normative juridical and empirical approach<sup>19</sup>. It was concluded from the results of this research that implementing the complete systematic land registration (CSLR) system in Indonesia is a significant step forward in verifying ownership of land. The complete systematic land registration system also provides legal protection of ownership rights as defined by the UUPA (Land Law), and it will greatly expedite the resolution of unregistered land divisions. However, there are many obstacles to the success of the program including inadequate communication between local community leaders (RTs) and the public, the loss of knowledge about land ownership, and a lack of financial resources to pay for the registration process<sup>20</sup>.

According to the research of Barkah Rizki Mayyasa, a valid Letter c is an essential legal document with respect to agrarian law and is viewed as one of the most legitimate

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<sup>18</sup> Hasirun Adi, Hardyta, Jestino Andre Pratama, And Sultan Kasiawa. 2024. "Persepsi Masyarakat Terhadap Kualitas Pelayanan Program Sertifikat Tanah Lengkap (Ptsl) Di Kota Baubau." *Sosial Dan Humaniora* 3 (5).

<sup>19</sup> Avivah, Lisnadia Nur, 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>.

<sup>20</sup> Hasirun Adi, Hardyta, Jestino Andre Pratama, And Sultan Kasiawa. 2024. "Persepsi Masyarakat Terhadap Kualitas Pelayanan Program Sertifikat Tanah Lengkap (Ptsl) Di Kota Baubau." *Sosial Dan Humaniora* 3 (5).

forms of evidence regarding ownership within the CSLR program. The implementation of the CSLR program faces many challenges, such as lack of clarity when it comes to land boundaries and owner identities. Moreover, if parties have not met all registration requirements, this puts them at risk for future conflicts<sup>21</sup>. In order to eliminate the possibility of future conflicts, local government officials must gather relevant and complete information about land lots they serve, as well as encourage community involvement in the process. For example, in the case of Patemon Village, there are also many unresolved issues related to the unfortunate absence of official land boundary definitions. Village officials obtained land boundary information using Letter C documents in addition to undertaking surveying to obtain accurate data on the location of each land lot (including the area of land)<sup>22</sup>. The results of the survey ultimately could serve as official evidence to support the issuance of land titles after the survey results had been completed and after negotiations had taken place with adjoining properties. This demonstrates that there are many administrative challenges related to the CSLR program, with the Letter C continuing to play a vital role as a systematic legal tool for the early prevention of land conflict.

Similar to the two aforementioned cases, Patemon Village also faced challenges regarding the management and determination of its land boundaries. The community and local officials encountered boundary uncertainty prior to processing these demarcations through the Complete Systematic Land Registration (PTSL) program. To overcome these administrative challenges, Patemon Village officials utilized the Letter C—a village land registry record which displays land boundaries during the PTSL registration process. Subsequently, cadastral mapping was conducted,

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<sup>21</sup> Ayu, Raden, Rani Mutiara Dewi, And Catherine Susantio. 2024. "Penggunaan Sertifikat Elektronik Untuk Meningkatkan Efisiensi Pendaftaran Tanah Dalam Upaya Pencegahan Mafia Tanah." *Syntax Admiration*. Vol. 5.

<sup>22</sup> Basuki, Glenn Daniel, And Mia Hadiati. 2025. "Keabsahan Akta Jual Beli Letter C Yang Diterbitkan Oleh Pejabat Pembuat Akta Tanah." *Jurnal Usm Law Review* 8 (2): 657.

which was deemed instrumental in assisting Patemon Village officials in obtaining precise and definitive land locations, areas, and boundaries<sup>23</sup>. The results of this measurement were then represented in a land measurement certificate, containing clearer mapping and territorial measurement results to serve as the legal basis for land certification and the official establishment of boundaries. Furthermore, this mapping process follows ethical regulations, whereby Patemon Village must first present the measurement results to neighboring villages or districts. Should a disagreement arise between Patemon Village and its neighbors, a consensus or mediation with the respective parties must be reached as a middle ground<sup>24</sup>.

The data obtained from this process will be used to develop land policy documents, including new and amended land title registrations, which will be reviewed and approved by appropriate authority. The case study shows that agencies conducting PTSL for land and agrarian issues are still facing problems and obstacles, and therefore it will be necessary to have preventive measures in place to mitigate PTSL-related conflict potential as early as possible by the local administrative authorities involved in conducting the PTSL process. The problems that were experienced in Patemon Village demonstrate that C Letter existence, position, and credibility in the PTSL Program and boundary demarcation process are critical. C Letter represents legal proof of ownership of utilized land that supports and resolves administrative barriers which could potentially create conflict

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<sup>23</sup> Budiarsa, Ferdi, Maulana Rifai, And Indra Aditya. 2024. "Implementasi Pendaftaran Tanah Sistematis Lengkap (Ptl) Sebagai Upaya Percepatan Pendaftaran Tanah Di Kota Bekasi." *Jurnal Ilmiah Wahana Pendidikan*, Desember 2024 (24): 485–98. <https://doi.org/10.5281/zenodo.7494707>.

<sup>24</sup> Basuki, Siti Hatia Adzannya, Yani Pujiwati, And Yusuf Saeful Zamil. "Perlindungan Hukum Terhadap Pemilik Hak Atas Tanah Belum Terdaftar Yang Dirugikan Akibat Maladministrasi Perangkat Pemerintahan Desa." *Litra: Jurnal Hukum Lingkungan, Tata Ruang, Dan Agraria* 2, No. 1 (October 31, 2022): 18–40. <https://doi.org/10.23920/Litra.V2i1.979>.

during PTSL Implementation<sup>25</sup>.

Based on the issues arising from the background described above, the author specifically investigates:

1. What is the legal standing of Letter C as the basis for proving land rights in the implementation of Complete Systematic Land Registration in Patemon Village?
2. What are the efforts made by village officials and land agencies to overcome obstacles in proving land rights based on Letter C during the implementation of PTSL?

The purpose of this research is normatively to analyze the place of Letter C within the system of national land law and empirically to evaluate how Letter C is used within the implementation of PTSL in Patemon Village. This paper will be divided into three main sections that provide a discussion of the normative framework of the legal status of Letter C, an empirical analysis of the implementation of PTSL, and an assessment of the implications for legal certainty<sup>26</sup>.

This research was conducted using normative legal research methods (statutory approach), by studying applicable land laws, such as the Basic Agrarian Law (UU PA) and its implementing regulations, which include provisions on land registration. This normative approach is supplemented by empirical research through interviews with village officials and other parties involved in the implementation of PTSL as well as through observation of administrative practices and verification procedures applied in the field. The combination of both approaches will provide a complete picture of the relationship between the legal framework defined by legislation and the actual practice of PTSL implementation. The qualitative data produced through these combined

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<sup>25</sup> Budiarsa, Ferdi, Maulana Rifai, And Indra Aditya. 2024. "Implementasi Pendaftaran Tanah Sistematis Lengkap (Ptl) Sebagai Upaya Percepatan Pendaftaran Tanah Di Kota Bekasi." *Jurnal Ilmiah Wahana Pendidikan*, Desember 2024 (24): 485–98. <https://doi.org/10.5281/zenodo.7494707>.

<sup>26</sup> Amril, A., Dwisvimiar, I., & Agustina, R. S. (2025). Legal Certainty Regarding the Cancellation of Property Rights Certificates From the Perspective of Land Registration Objectives (Case Study of Property Rights No. 55 in Tanjung...). *Fox Justi: Jurnal Ilmu Hukum*, 15(03), 806-817.

methods was analyzed through processes of analysis, categorization, and interpretation in order to identify consistent patterns of relationships between legal norms and administrative practices and to evaluate the implications.

## **B. The Legal Standing of 'Letter C' as the Basis for Proving Land Rights in the Implementation of Complete Systematic Land Registration (CSLR) in Patemon Village**

### **1. "Letter C" in the National Land Law System**

According to Article 19, Basic Agrarian Law No. 5 of 1960 (UUPA), in the Indonesian land law system land certificate is the most definitive proof of ownership, and through the registration of land at the government office proof of ownership as an evidence, it provides Landholders with both the legal certainty and protection of ownership. In addition, Government Regulation No 24 of 1997 Land registration also provides that a Certificate issued is valid proof of ownership so long as the information found on that Certificate matches the information contained in the Land Book. Letter C must not be relied upon as a final determination of ownership, but simply a document used by Local government as bureaucratic documents to catalogue, record Tax Objects established prior to the enactment of UUPA; thus, legally speaking, Letter C has no equivalent standing or status as a Land Right Certificate issued by the BPN (National Land Agency)<sup>27</sup>.

Even though the Indonesian registration system does not prohibit the use of historical documents or village administrative records, Government Regulation Number 24 of 1997 provides that additional written documentation, affidavits and physical occupancy can be used as evidence to support initial registration of land, as long as those

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<sup>27</sup> Devita, Seventina Monda. "Perkembangan Hak Pengelolaan Atas Tanah Sebelum Dan Sesudah Peraturan Pemerintah Nomor 18 Tahun 2021 Tentang Hak Pengelolaan, Hak Atas Tanah, Satuan Rumah Susun, Dan Pendaftaran Tanah." *Jurnal Hukum Lex Generalis* 2, No. 9 (September 24, 2021): 870–88. <https://doi.org/10.56370/Jhlg.V2i9.130>.

documents satisfy the authority's requirements<sup>28</sup>. Therefore, within this framework, Letter C will not act on its own as conclusive evidence of ownership of land, merely provides an administrative means to reference a document that establishes ownership of land.

Further to the fact that Letter C is currently recognised as a practice; it also originates from land law development within Indonesia. Historically, when Indonesia implemented the registration system as we know it now; it was essential for village administrations to track the manner in which people used and occupied land. For this reason, regarding Letter C as a social-legal concept reflects an acknowledgment by local governments of local community and administrative document use related to owned properties, and indicates a connection between the community and the land they occupy. If Letter C were to become obsolete without an appropriate transition piece, the provision may result in a gap within the Indonesian legal system that would be detrimental to the land ownership issue within the country as a whole.

## ***2. The Acceptance of "Letter C" in PTSL Practices in Patemon Village***

An empirical study conducted in Patemon Village supports the community's use of Letter C to substantiate claims for the Complete Systematic Land Registration (CSLR) program. Almost all land registered in the CSLR Program in Patemon Village consists of lands previously unregistered and based solely on Letter C from the village government. This means the community owned land before the state provided land registration formalization, indicative of ongoing socio-legal environments throughout much of the country<sup>29</sup>.

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<sup>28</sup> Nathania, Nanda Riesta, Zakiya Az Zikra Ismail, And M. Rivatul Ulum. "Solusi Mengatasi Krisis Tanah Dan Pentingnya Pendaftaran Tanah Di Indonesia Dalam Mewujudkan Kepastian Hukum." *Management Economics Trade And Accounting Journal (Meta Journal)* 2, No. 2 (2024): 45–52. <https://doi.org/10.36722/Jmih.V2i2.744>.

<sup>29</sup> Nurmalia, Ranti Diva, And Temmy Fitriah Alfiany. "Analisis Dan

The Patemon Village community's application of Letter C for their participation in the CSLR aligns with the progressive goals and implementation strategies of CSLR, which aim to facilitate rapid first-time mass registration of land for the purpose of achieving full legal certainty and developing an orderly system of land administration. As such, Letter C is the mechanism that the state has established for identifying, verifying, and recording the rights of individuals to land through prior registration with the state<sup>30</sup>.

The Local Government verification process confirms the Validity of Letter C in supported by the Local Government officials and the (CSLR), or answered by the Centralized Systematic Land Register Committee and the Land Office. This shows the way the state Uses Letter C in utilizing the CSLR process represents a practical understanding of the necessity to support Written Law with the manner that people use and own Land in the Community. Instead of requiring Written Documentation, to prove Ownership, the State allows for the Use of a Systematic Method of Property Registration to Verify Ownership Over Time, on Property<sup>31</sup>. Using The Law as a Form of Social Engineering, The Law Provides the Right to Define and Control the Use of Property, Rather Than Only Serving to limit Rights and Ownership. Since Land Registration Remains Low, The State Provides for the registration of Land by example.

### ***3. The Practice of Letter C Acceptance in PTSL at Patemon Village***

Research in Patemon Village has demonstrated the

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Implimentasi Sertifikat Ganda Hak Milik Atas Tanah Berdasarkan Pasal 19 Uupa Dalam Perspektif Hukum Perdata." Indonesian Journal Of Law And Justice 2, No. 1 (2024): 1–10. <https://doi.org/10.47134/ijl.v2i1.3096>.

<sup>30</sup> Satrio Nugroho, Rio, And Nourma Dewi. 2023. "Pelaksanaan Pendaftaran Tanah Pertama Kali Dengan Alas Hak Letter C Desa Secara Jual Beli (Studi Kasus Di Kantor Pejabat Pembuat Akta Tanah Kabupaten Boyolali)." Jurnal Bevinding 01 (03).

<sup>31</sup> Nurwanti, Yulian Dwi. "Pembagian Kepemilikan Tanah Yang Berkeadilan Sosial Berbasis Transendental." Prosiding Seminar Nasional Program Doktor Ilmu Hukum, 2024, 85–92.

widespread acceptance and use of Letter C as a basis for filing Complete Systematic Land Registration (PTSL) applications. Most parcels involved in the PTSL program in this area were previously classified as unregistered and were only recognised by local authority records through Letter C. This situation is similar to that of many other regions where community tenure has existed for generations without a formal rights registration<sup>32</sup>. The community uses Letter C as a form of evidence to substantiate their right to occupy land and considers it valid proof of their land's legitimacy, even though it is not recognised formally as having the same level of legal standing as a land title. This perception shows that there is a discrepancy between formal legal definitions (written documents recognised as legally owning and occupying land) and informally understood definitions (how the community understands their rights to occupy land) at the local level<sup>33</sup>.

The acceptance of Letter C in implementing the PTSL program in Patemon Village is consistent with the PTSL program's objectives, which are to speed up the mass registration of first-time land ownership to provide legal certainty and orderly management of land. Letter C also serves as an administrative entry point for the state to do an inventory and verify and record rights to land that existed but have never been formally registered<sup>34</sup>. This approach demonstrates inclusive reform of land management practices. The state does not limit access to certification only to those

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<sup>32</sup> Ardani, Mira Novana. "Peran Kantor Pertanahan Dalam Kegiatan Pendaftaran Tanah Sistematis Lengkap." *Gema Keadilan* 6, No. 1 (June 13, 2019): 45–62. <https://doi.org/10.14710/Gk.2019.5118>.

<sup>33</sup> Arnanto, Ardhi, Tri Ida Wijayanti, And Harvini Wulansari. 2025. "Pelatihan Digitalisasi Data Pertanahan Bagi Pemerintah Kalurahan Pampang, Kapanewon Paliyan, Kabupaten Gunungkidul." *Jurnal Abdi Masyarakat Indonesia* 5 (2): 425–38. <https://doi.org/10.54082/Jamsi.1644>.

<sup>34</sup> Puteri, Shintiya Permata, And Asmarani Ramli. 2025. "Kepastian Hukum Letter C Sebagai Bukti Kepemilikan Tanah Dalam Perspektif Pp Nomor 18 Tahun 2021." *Jihhp* 5 (5). <https://doi.org/10.38035/Jihhp.V5i5>.

with full formal documentation; it allows community members with only administrative records from their villages to participate in this process. This is significant since most property in the villages has never been officially recorded<sup>35</sup>.

The endorsement of Letter C provides no guarantee of ownership. At Patemon Village, Letter C is the primary basis for establishing preliminary evidence. While Letter C is used to establish preliminary evidence, it should not be relied on as the sole basis of establishing evidence. Evidence must be corroborated through PTSL stages that include administration review, land boundary demarcation, measurement and public notice of legal data. Thus the evidentiary quality of Letter C is not absolute; it is determined by the PTSL committee, land office and other official evidence from PTSL verification. In addition, during the verification steps, officials include a review not only of whether Letter C is on file, but also whether the individual named on Letter C has a continuous ownership history. To determine if discrepancies exist between the applicant and the name on Letter C, further clarification needs to be obtained from the applicant, usually in the form of a sworn statement or other documents. This demonstrates that Letter C is one piece of a cumulative evidence system rather than one document establishing rights to a property<sup>36</sup>.

Letter C's use in PTSL provides an additional view of the state's pragmatic use of this document to connect written law with land tenure practices in the community. Rather than requiring a high degree of proof of rights at first, the state allows gradual proof of rights through systematic registration

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<sup>35</sup> Putrisasmita, Gianni. 2023. "Kedudukan Program Pendaftaran Tanah Sistematis Lengkap Dalam Kerangka Reforma Agraria Untuk Mewujudkan Kepastian Hukum Pertanahan Di Indonesia." *Litra: Jurnal Hukum Lingkungan, Tata Ruang, Dan Agraria* 3 (1): 18–36. <https://doi.org/10.23920/Litra.V3i1.1466>.

<sup>36</sup> Basuki, Siti Hatia Adzannya, Yani Pujiwati, And Yusuf Saeful Zamil. "Perlindungan Hukum Terhadap Pemilik Hak Atas Tanah Belum Terdaftar Yang Dirugikan Akibat Maladministrasi Perangkat Pemerintahan Desa." *Litra: Jurnal Hukum Lingkungan, Tata Ruang, Dan Agraria* 2, No. 1 (October 31, 2022): 18–40. <https://doi.org/10.23920/Litra.V2i1.979>.

processes<sup>37</sup>. The law is not simply a tool of oppression, but it is also an adaptable agent of social engineering, particularly in areas with low land registration levels<sup>38</sup>. Furthermore, the practice of accepting Letter C evidences how local social structures such as RT (Neighborhood Association) and RW (Citizens Association) helped affirm that the Letter C is a trustworthy source of verified land tenure. The existence of social testimony regarding the history of tenure and lack of disputes adds to the strength of Letter C as a basis for recording rights. Therefore, proofs of evidence used to establish land rights under PTSL consist of a mixture of documented records and a continuing social relationship that exists within the community<sup>39</sup>.

Although there may be potential problems arising due to a lack of proper administrative prudence, practice is essential! If data is not continuously updated or land boundaries are determined without coordination, there could be problems later regarding Letters C. For this reason, every Letter C must always be considered in the context of strict supervision and verification to prevent future issues in the acceptance of Letter C<sup>40</sup>. In conclusion, while a Letter C may

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<sup>37</sup> Nurwanti, Yulian Dwi. "Pembagian Kepemilikan Tanah Yang Berkeadilan Sosial Berbasis Transendental." *Prosiding Seminar Nasional Program Doktor Ilmu Hukum*, 2024, 85–92.

<sup>38</sup> Devita, Seventina Monda. "Perkembangan Hak Pengelolaan Atas Tanah Sebelum Dan Sesudah Peraturan Pemerintah Nomor 18 Tahun 2021 Tentang Hak Pengelolaan, Hak Atas Tanah, Satuan Rumah Susun, Dan Pendaftaran Tanah." *Jurnal Hukum Lex Generalis* 2, No. 9 (September 24, 2021): 870–88. <https://doi.org/10.56370/Jhlg.V2i9.130>.

<sup>39</sup> Devita, Seventina Monda. "Perkembangan Hak Pengelolaan Atas Tanah Sebelum Dan Sesudah Peraturan Pemerintah Nomor 18 Tahun 2021 Tentang Hak Pengelolaan, Hak Atas Tanah, Satuan Rumah Susun, Dan Pendaftaran Tanah." *Jurnal Hukum Lex Generalis* 2, No. 9 (September 24, 2021): 870–88. <https://doi.org/10.56370/Jhlg.V2i9.130>.

<sup>40</sup> Nathania, Nanda Riesta, Zakiya Az Zikra Ismail, And M. Rivatul Ulum. "Solusi Mengatasi Krisis Tanah Dan Pentingnya Pendaftaran Tanah Di Indonesia Dalam Mewujudkan Kepastian Hukum." *Management Economics Trade And Accounting Journal (Meta Journal)* 2, No. 2 (2024): 45–52.

be the primary administrative basis for the first-time registration of land in Patemon Village, the role of a Letter C is somewhat conditional in that the legal strength of any Letter C is directly related to the verification process and the social recognition and physical registration of the resulting title in the national land registration system.

#### ***4. The Legal Standing of "Letter C" from Administrative and Functional Perspectives***

On the basis of the above, the legal significance of Letter C in connection with the application of the CSLR to properties in Patemon Village is that Letter C may be classified as a "documentary" and/or "administrative" form of evidence, however Letter C does not provide any land rights. Letter C may instead represent a land owner's possession of or administrative recognition of that possession from a governmental or administrative body. Consequently, a person cannot establish legal ownership of property until the State has recorded the property in accordance with the State Land Registration Act and subsequently issued a certificate of title for the property in the name of the recorded owner<sup>41</sup>.

The interpretation of Letter C is also in line with the Agrarian Law doctrine, which defines the concept of land registration as being a "constitutive" act that is part of the administrative law of Angola; that is, land registration provides the State with an administrative means of providing formal recognition of land rights. Letter C can therefore be viewed as a preliminary "begin van bewijs" of a land rights claim, and must be supported by additional evidence, as well as verified through administrative land registration<sup>42</sup>.

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<https://doi.org/10.36722/Jmih.V2i2.744>.

<sup>41</sup> Aslinda, Andi, Nur Asyifa T, Andi Cudai Nur, Program Studi, Ilmu Administrasi Negara, And Jurusan Ilmu Administrasi. 2024. "Implementation Program For Complete Systemic Land Registration (Ptl) For Acceleration Of Land Registration At Makassar Land Office." *Jurnal Aktor* 4 (1): 2808–5167.

<sup>42</sup> Putrisasmita, Gianny. 2023. "Kedudukan Program Pendaftaran Tanah Sistematis Lengkap Dalam Kerangka Reforma Agraria Untuk Mewujudkan Kepastian Hukum Pertanahan Di Indonesia." *Litra: Jurnal Hukum Lingkungan, Tata Ruang, Dan Agraria* 3 (1): 18–36.

Letter C, in the context of the CSLR, represents agrarian law's adaptability to provide for the recognition of local community social conditions, where the absence of formal evidence does not restrict the State from permitting people access to land registration<sup>43</sup>. Letter C serves as an instrument to confirm a person occupies land while waiting to receive a formal Certificate of Title as part of the verification process. Due to Letter C's status as evidence of administrative and functional use, it will depend on the perspective of the land official and the community regarding its effects. While Letter C should not be confused with absolute ownership, it cannot be dismissed as irrelevant. Letter C establishes a legal bridge between possession of land and the National Land Registry under the CSLR<sup>44</sup>. Therefore, what influences Letter C's legal standing is the level of verification, transparency, and due diligence performed by the officials in determining consistency between the juridical data and the physical characteristics of the property.

## **C. Efforts by Village Authorities and Land Agencies in Overcoming Obstacles to 'Letter C'-Based Land Rights Verification in the Implementation of PTSL**

### **1. Acceptance of Letter C as a Legal Basis for Rights (*Alas Hak*) in PTSL**

The use of "Letter C" (or "alas hak") is observable throughout the village of Patemon as the most extensively used tool for obtaining land certificates through the PTSL

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<https://doi.org/10.23920/Litra.V3i1.1466>

<sup>43</sup> Amril, A., Dwisvimiari, I., & Agustina, R. S. (2025). Legal Certainty Regarding the Cancellation of Property Rights Certificates From the Perspective of Land Registration Objectives (Case Study of Property Rights No. 55 in Tanjung...). *Fox Justi: Jurnal Ilmu Hukum*, 15(03), 806-817.

<sup>44</sup> Puteri, Shintiya Permata, And Asmarani Ramli. 2025. "Kepastian Hukum Letter C Sebagai Bukti Kepemilikan Tanah Dalam Perspektif Pp Nomor 18 Tahun 2021." *Jihhp* 5 (5). <https://doi.org/10.38035/Jihhp.V5i5>.

program. Most land being granted through PTSL was previously never officially registered, and thus has no formal title; there is only a record of ownership via Letter C recorded by the village administration. The dependency on Letter C illustrates that the method in which villages record land has become the primary means by which the community generates evidence of its land ownership. The disparity between the national land law and customary community land tenure shows that there can be two separate types of land tenure existing concurrently. By utilizing a sociology of law approach, we can see how the utilisation of Letter C as evidence of land ownership demonstrates how there exists indirect pluralism (through social recognition) between the state PTSL and customary administrative laws. Socially, the community utilises Letter C as evidence of the community's previous occupation of land.

Despite Letter C's lack of normative status as perfect proof of ownership, PTSL procedures demonstrate flexibility in allowing Letter C to be used as a base for proof. The acceptance of Letter C as an acceptable base of proof does not imply formal recognition of ownership. Rather, it forms part of the state's efforts to develop those parcels of land that have existed outside of the formal system of land registration into the nation's system of land law. PTSL is classified as an area-based, maximum number of people at once program<sup>45</sup>. An acceptance using methods of proof through PTSL will be less rigid than for sporadic individual land registrations. The state will be using the older records, including the Letter C, that represent proof of title in a much more inclusive way in order to assist the tool in verifying an area became an "acceptable business environment"<sup>46</sup>.

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<sup>45</sup> Nindi Hastuti, Intan, And Siti Malihkatun Badriyah. 2024. "Pelaksanaan Pendaftaran Tanah Melalui Ptsl Di Kabupaten Pekalongan." *Notarius* 17.

<sup>46</sup> Nurmala, Ranti Diva, And Temmy Fitriah Alfiany. "Analisis Dan Implimentasi Sertifikat Ganda Hak Milik Atas Tanah Berdasarkan Pasal 19 Uupa Dalam Perspektif Hukum Perdata." *Indonesian Journal Of Law And Justice* 2, No. 1 (2024): 1–10. <https://doi.org/10.47134/ijj.V2i1.3096>.

Patemon Village accepts Letter C as a lawful form of proof despite many residents lacking other valid documentation. Without Letter C being recognized as a valid form of evidence, most residents would be unable to successfully apply for certificates. Therefore, Letter C's acceptance under PTSL represents an element of social equity in land policy by allowing previously disenfranchised members of the community to obtain certifications<sup>47</sup>. Although Letter C is accepted, it is still subject to the provisions of administrative prudence. Instead of being considered as the singular piece of evidence required to immediately issue a certificate, Letter C is viewed as a primary source of documentation requiring other document verification before being issued a certificate. This illustrates that even though officials have accepted Letter C as evidence, they are still cognizant of its legal limitations and do not recognize it as irrefutable proof of ownership<sup>48</sup>.

Letter C is perceived as a movement away from prescriptive, normative approaches to more practical experiential ones. In Legal Theory implementation, this process may be described as judicial discretion aimed at achieving policy objectives by bridging the gap between normative legal standards and the 'actuality' of an unformally documented community. While acceptance of Letter C within PTSL raises barriers related to distinguishing between the use of judicial discretion and judicial certainty, unverified use of Letter C creates opportunity for exaggerated claims of title or vagueness in the title transfer process. This illustrates that judicial discretion surrounding Letter C should always be

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<sup>47</sup> Avivah, Lisnadia Nur, 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>.

<sup>48</sup> Nathania, Nanda Riesta, Zakiya Az Zikra Ismail, And M. Rivatul Ulum. "Solusi Mengatasi Krisis Tanah Dan Pentingnya Pendaftaran Tanah Di Indonesia Dalam Mewujudkan Kepastian Hukum." *Management Economics Trade And Accounting Journal (Meta Journal* 2, No. 2 (2024): 45–52. <https://doi.org/10.36722/Jmih.V2i2.744>.

supported by systematic assessment processes<sup>49</sup>.

Submission of an Application to PTSL-Letter C indicates that the "State" is aware of and acknowledging the existence of a village's historical administrative records as part of their transitional development of a more contemporary and inclusive formal land registration system. In this sense, Letter C establishes a link between actual, frequently unrecognised ownership of land through informal ownership processes. Letter C was accepted as the law in PTSL<sup>50</sup>; it should not be seen as straying from normative legal principles but instead viewed as a policy adjustment to improve access to legal certainty. For this adjustment to be justifiable, it must have adequate confirmation through administration verification and also provide for adequate technical oversight, so that the final objectives of legal certainty and protection are satisfied.

## ***2. Administrative Verification and Social Validation***

Even though Letter C was accepted as a valid basis to implement PTSL in the Patemon Village of Papua, it does not automatically provide sufficient evidence to establish a person's ownership rights. Based on evidence from field observation, it is clear that the evidentiary process consists of numerous levels of administrative verification in order to establish a connection between the person claiming the land and the property that is listed in Letter C<sup>51</sup>.

The first administrative level of verification occurs first by RT and RW. As social institutions, RT and RW are in a

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<sup>49</sup> Nindi Hastuti, Intan, And Siti Malihkatun Badriyah. 2024. "Pelaksanaan Pendaftaran Tanah Melalui Ptsl Di Kabupaten Pekalongan." Notarius 17.

<sup>50</sup> Nurmala, Ranti Diva, And Temmy Fitriah Alfiany. "Analisis Dan Implimentasi Sertifikat Ganda Hak Milik Atas Tanah Berdasarkan Pasal 19 Uupa Dalam Perspektif Hukum Perdata." Indonesian Journal Of Law And Justice 2, No. 1 (2024): 1–10. <https://doi.org/10.47134/ljij.v2i1.3096>.

<sup>51</sup> Nurwanti, Yulian Dwi. "Pembagian Kepemilikan Tanah Yang Berkeadilan Sosial Berbasis Transendental." Prosiding Seminar Nasional Program Doktor Ilmu Hukum, 2024, 85–92.

unique position to verify the historical context of land tenure in the areas in which they operate. The information collected by RT and RW not only provide administrative verification but also provide a mechanism for social recognition of the applicant's land claims. In cultures where property relationships are often generational, social recognition fosters a high degree of legitimacy of the applicant's claims to property.

At the next stage of administrative verification, an examination is conducted by the village administrator to verify that the data contained in Letter C correspond to applicant's identity. If the applicant and Letter C do not match, the applicant is required to provide sufficient evidence to demonstrate the history of the transfer of his/her property. This evidence is usually in the form of a private sales transaction, inheritance certificate<sup>52</sup>.

The Operation of the Concept of Administrative Prudence in Land Law Can be Interpreted Through This Mechanism. In Public Land Administrations, Land Coffee-Writing Will Be Based on a Single Administration Document, Specifically Letter C In Relation To That Document. In Addition to The Administrative Document Supporting The Land Claim, There Will Need to Be A Consistent Social Validation Of That Land Claim As Well The Physical State Of The Land. Therefore, Letter C Represents A Link In A Continuous Chain Of Information About The Land<sup>53</sup>.

the social validation process is a key requirement in the content of that social validation process: some community members must also state that they do not dispute the land claim, do not have control of the land being claimed

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<sup>52</sup> Puteri, Shintiya Permata, And Asmarani Ramli. 2025. "Kepastian Hukum Letter C Sebagai Bukti Kepemilikan Tanah Dalam Perspektif Pp Nomor 18 Tahun 2021." *Jihhp* 5 (5). <https://doi.org/10.38035/jihhp.v5i5>.

<sup>53</sup> Putrisasmita, Gianny. 2023. "Kedudukan Program Pendaftaran Tanah Sistematis Lengkap Dalam Kerangka Reforma Agraria Untuk Mewujudkan Kepastian Hukum Pertanahan Di Indonesia." *Litra: Jurnal Hukum Lingkungan, Tata Ruang, Dan Agraria* 3 (1): 18–36. <https://doi.org/10.23920/Litra.V3i1.1466>.

by another person, and that they know the boundaries of the land within their community since this will function to provide a horizontal control mechanism minimizing any potential for an individual's unilateral claim for the property being claimed. Objections raised by other community members related to boundary issues or claims of ownership for the property being claimed will manifest early in the process of being supplied to the land/property administrator.

However both the social validation and administrative verifications over the land claim will have limitations as they relate to evidence (authentic/legally conclusive) of the land tenure will be completely dependent by the integrity of the parties creating the evidence/statement as well, if any objections exist by neighbours there will also have a function to provide if there are any discrepancies as related to an individual's land claim or tenure will provide an adequate amount of supervision as related to an individual's land claim/tenure which the land claims or tenures will be subject to any type of data manipulation. another restriction is found in the disorganization of the letter c administration itself; the Letter C books are not always kept up to date when the amount of land decreases from being recognized for the first time<sup>54</sup>. This can confuse the amount of land that the applicant has actually held. As a result, it is important that administrative verification is concerned with both the identity of the applicant as well as the reliability of the history of the village in which the administrative officer is located<sup>55</sup>.

From an implementation standpoint, the program of verification via social validation is a compromise between the

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<sup>54</sup> Putrisasmita, Gianni. 2023. "Kedudukan Program Pendaftaran Tanah Sistematis Lengkap Dalam Kerangka Reforma Agraria Untuk Mewujudkan Kepastian Hukum Pertanahan Di Indonesia." *Litra: Jurnal Hukum Lingkungan, Tata Ruang, Dan Agraria* 3 (1): 18–36. <https://doi.org/10.23920/Litra.V3i1.1466>.

<sup>55</sup> Mayyasa, Barkah Rizki, Fitriya Dewi Navisa, And Suratman. "Letter C Sebagai Alat Bukti Kepemilikan Hak Atas Tanah Dan Problematikanya Terkait Program Pendaftaran Tanah Sistematis Lengkap (Ptl) Masal (Studi Di Desa Pajangan, Kecamatan Sukodadi, Kabupaten Lamongan)." *Dinamika* 30, No. 1 (2024): 9896–9906. <https://doi.org/10.25130/Sc.24.1.6>.

need to speed up the precision and the need to ensure that legal documents will be legally binding. Since the national program of PTSL has been established using quantitative measures; it is not possible to complete a thorough examination of every human and his/her land record; thus, the state uses a combination of administrative documentation and social documentation as proof of land ownership<sup>56</sup>.

While this is an effective solution, it must be kept accountable. Village officials must provide evidence of all documents submitted to verify their existence, which requires accountability. Village officials need to ensure the accuracy of every supporting document submitted as an accurate reflection of the actual facts. The success or failure of the verification process will largely depend on the integrity of the village officials and the participation of the community.

To summarize, land right verification and social validation through administrative verification for PTSL in Patemon Village does not occur independently from, but rather as a part of a blended verification process that combines social and administrative verification through a clarifying process. The verifying mechanism will be the first point through which a state will legally recognise the applicant by issuing a certificate. However, the process will also only be valid if it is accurately and consistently followed by the administrator<sup>57</sup>.

### ***3. Technical Issues and Land Boundary Disputes***

In addition to administrative problems with using Letter C as a legal basis of Land Registration, there are large technical issues as well with regard to PTSL implementation at Patemon Village. The research shows that many of the

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<sup>56</sup> Rachmawati, Sisca Anindya. 2021. "Revolusi Sistem Pencatatan Tanah Melalui Program Pendaftaran Tanah Sistematis Lengkap (Ptsl) Studi Lapangan Di Desa Bantul." *Pranata Hukum* 3 (1).

<sup>57</sup> Arnanto, Ardhi, Tri Ida Wijayanti, And Harvini Wulansari. 2025. "Pelatihan Digitalisasi Data Pertanahan Bagi Pemerintah Kalurahan Pampang, Kapanewon Paliyan, Kabupaten Gunungkidul." *Jurnal Abdi Masyarakat Indonesia* 5 (2): 425–38. <https://doi.org/10.54082/Jamsi.1644>.

disputed spatial boundaries in practice have a greater basis in physical inaccuracy than any defects in the Letter C documentation itself; thus, the degree to which registered land has legal certainty is determined not only by the validity of juridical data but also by how closely physical data is measured<sup>58</sup>.

The measurement phase during PTSL has an overarching goal of completion within a specified time frame, which creates time limitations on the execution of mass-scale measurements. Measurement is a very important phase in the land registration system because it is that portion of the process which establishes the area and limits of a parcel of land. Errors may occur during the establishment of coordinate points or physical boundaries, resulting in certificates being issued with area descriptions not matching what actually exists on the ground<sup>59</sup>.

There are discrepancies between the actual land area occupied in Patemon Village and the land area indicated in the PTSL certificate. These discrepancies result from imprecise measurements taken by an applicant when defining boundaries and/or because neighbouring land owners were not present when measurements were taken<sup>60</sup>. The absence of neighbouring land owners can result in a unilateral method of defining a boundary for that reason, which could lead to a possible future challenge. This presents

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<sup>58</sup> Putrisasmita, Gianni. 2023. "Kedudukan Program Pendaftaran Tanah Sistematis Lengkap Dalam Kerangka Reforma Agraria Untuk Mewujudkan Kepastian Hukum Pertanahan Di Indonesia." *Litra: Jurnal Hukum Lingkungan, Tata Ruang, Dan Agraria* 3 (1): 18–36. <https://doi.org/10.23920/Litra.V3i1.1466>

<sup>59</sup> Amril, A., Dwisvimiari, I., & Agustina, R. S. (2025). Legal Certainty Regarding the Cancellation of Property Rights Certificates From the Perspective of Land Registration Objectives (Case Study of Property Rights No. 55 in Tanjung...). *Fox Justi: Jurnal Ilmu Hukum*, 15(03), 806-817.

<sup>60</sup> Rahmawati, S. A., Hadibroto, G., & Silviana, A. (2022). Implementation of Registration of Ex- Customary Land through Complete Systemic Land Registration in Pemalang Regency. *Journal of Law and Legal Reform*, 3(4), 431-456.

a critical viewpoint regarding how the principle of prudence is applied to measuring land under the mass-scale PTSL programme. Ideally, the method of measuring land should be transparent and involve participation from all adjoining land owners. Unfortunately, due to high workloads and time constraints, the procedure for measuring land has oftentimes been done quickly and has not been confirmed by verifying the fields accurately<sup>61</sup>.

From an agrarian law viewpoint, incorrect land measurement can have serious implications for the holder of a land certificate, as certificates issued on the basis of incorrect physical surveys are especially vulnerable to challenge by the means of administrative cancellation or through filing a civil suit in the corresponding court<sup>62</sup>. This highlights that the expedited process of certification cannot come at the expense of accuracy and thoroughness of defining the boundaries of the land. Issues related to technical issues also occur with Letter C administration, which does not always reliably reflect updates to the land area involved. For example, an area that has been recorded as part of a Letter C administration may not be corrected even if some of the land in that area has already been transferred or otherwise disposed of. Therefore if an applicant applies for the entire area shown in their Letter C even if part of that area has already been transferred or otherwise disposed of, there could be an excess amount of claims on those strips of land.

Further, the potential for overlapping land parcels arises from failure to synchronize newly measured and previously registered certificate data within the context of

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<sup>61</sup> Saputro, Ridwan Alfi. "Pembuktian Penguasaan Hak Atas Tanah Untuk Pengajuan Pendaftaran Tanah Sistematis Lengkap (Ptl) Di Kelurahan Kalibata Rw 05 Tahun 2019-2020 Berdasarkan Pp Nomor 24 Tahun 1997." *Al-Zayn: Jurnal Ilmu Sosial & Hukum* 3, No. 4 (2025): 3971–78.

<sup>62</sup> aputro, Ridwan Alfi. "Pembuktian Penguasaan Hak Atas Tanah Untuk Pengajuan Pendaftaran Tanah Sistematis Lengkap (Ptl) Di Kelurahan Kalibata Rw 05 Tahun 2019-2020 Berdasarkan Pp Nomor 24 Tahun 1997." *Al-Zayn: Jurnal Ilmu Sosial & Hukum* 3, No. 4 (2025): 3971–78.

PTSL implementation. Past certified lands may also be affected by determination of boundaries on newly measured parcels resulting in horizontal conflicts with regard to previously never having existed among the resident populations in the area<sup>63</sup>. These technical issues illustrate a gap between the normative objective of PTSL being to achieve legal certainty and what happens during the process of implementing PTSL in the field. Legal certainty is not simply the issuance of certificates, it also includes that the certificate includes correct information. A certificate that has been issued with technical errors creates a new source of legal uncertainty<sup>64</sup>.

According to the conditions set in Patemon Village, issues with land measurement and boundaries show that Letter C is not primarily responsible for landowner disputes. The greater issues that can potentially threaten long-term legal relationships between landowners exist in the area of weak technical performance and weak technical management/supervision. Therefore the defense of Letter C proofs will remain acceptable so long as they have an accurate and transparent technical basis<sup>65</sup>.

Quality control of all measurements and your ability to synchronize physical and juridical data need to be improved in order to implement PTSL. If there is not adequate technical supervision during accelerated certification, then certificates will be administratively valid but have potential for substantive dispute. Therefore, building technical capacities and oversight will be prerequisites to accomplish the goal of

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<sup>63</sup> Sibuea, Harris Yonatan Parmahan. "Arti Penting Pendaftaran Tanah Untuk Pertama Kali." *Negara Hukum: Membangun Hukum Untuk Keadilan Dan Kesejahteraan* 2, No. 2 (2011): 287–306.

<sup>64</sup> Rahmawati, S. A., Hadibroto, G., & Silviana, A. (2022). Implementation of Registration of Ex- Customary Land through Complete Systemic Land Registration in Pemalang Regency. *Journal of Law and Legal Reform*, 3(4), 431-456.

<sup>65</sup> Saputro, Ridwan Alfi. "Pembuktian Penguasaan Hak Atas Tanah Untuk Pengajuan Pendaftaran Tanah Sistematis Lengkap (Ptsl) Di Kelurahan Kalibata Rw 05 Tahun 2019-2020 Berdasarkan Pp Nomor 24 Tahun 1997." *Al-Zayn: Jurnal Ilmu Sosial & Hukum* 3, No. 4 (2025): 3971–78.

legal certainty.

## D. Conclusion

From the normative and empirical research results stated above, it is concluded that the Letter C does not constitute a legal instrument of proof under the National land law system but is an administrative document which can only be used as preliminary evidence (*begin van bewijs*). Besides the Letter C, according to Article 19 of UUPA and Government Regulation 24/1997, there is no other instrument that has sufficient strength to constitute a legal land title certificate (legitimate and final proof) under the land law or regulation. Letter C is not a tool of creating land rights; it simply serves as evidence (administrative record) of the existence of land tenure type records (registration) maintained at the village level.

The Letter C has been identified as a useful transition-based administrative instrument to facilitate the initial registration of land under the Complete Systematic Land Registration (PTSL) programme because it provides a legal basis for land that has previously not been registered due to a lack of official documented records supporting the legal basis upon which the village administratively is supporting the PTSL application. There is a legally defined and accepted mechanism for confirming that the administrative verification and social validation processes (with the help of the RT, RW, village official, and land office) occur before the land will be considered as being registered in the official land register as part of the PTSL application process.

According to the study's findings, there are not just normative weaknesses in the documents used to establish land rights, but also additional barriers in the technical and administrative aspects of proving land rights. These barriers include the lack of consistent and up-to-date data, interruptions in chains of title due to informal transfers, and irregular or erroneous measurements of land and property boundaries. Therefore, the problems caused by proving land ownership using Letter C are primarily related to the quality of the implementations and technical supervision involved,

rather than the existence of Letter C.

To strengthen the legal certainty for the implementation of PTSL based on Letter C, it is necessary to have a verification system that is consistent, transparent, and accountable. In addition to social validation, there must be careful examination and precise technical measurement of the property; however, at present, due to the limitations of village officials in managing land administration, periodic updates of Letter C data, and the need for orderly documentation of all property transfers, it is necessary to improve the regulatory framework for this process. Land agencies can help to strengthen the PTSL process through various strategic efforts such as creating digital databases, integrating land parcel maps into the existing geographic information system (GIS), and improving the quality of land measurement through rigorous quality control measures. These actions will help to minimize the risk of land disputes in the future. Letter C may legally connect factual land tenure to formal state recognition via a certificate. Provided that C is restricted within an administrative framework and rigorously verified, the application of Letter C in PTSL complies with the principle of legal certainty and will be employed as an integrative tool to facilitate the orderly movement toward national land administration.

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## Acknowledgment

Recognize those who helped in the research, especially funding supporter of your research. Include individuals who have assisted you in your study: Advisors, Financial support, or may other parties involved on the research.

## Funding Information

Please provide funding information of the research

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