

*Perspective Analysis of Business Competition Supervisory Commission
Regarding OJK Circular Letter*

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Abstract

The problem with the lower limit of the tariff lies in determining the amount of the lower limit. Generally, the lower limit is set with the aim of protecting all business actors in the industry without exception, including those who are inefficient and tend to be a burden on the industry in the long term. The lower limit will greatly benefit efficient business actors who should offer the competitive rates they would otherwise receive. The purpose of this study is to explain the Perspective Analysis of the Business Competition Supervisory Commission (KPPU) regarding OJK Circular Letter No. 6/SEOJK.05/2017 Year 2017 in Pekanbaru City, explaining the obstacles faced by the Business Competition Supervisory Commission (KPPU) regarding OJK Circular Letter No. 6/SEOJK.05/2017 Year 2017 in Pekanbaru City. This research is a sociological legal research using a positive law enforcement approach. Because there is no study on the results of the OJK Circular Study No. 6 / SEOJK.05 / 2017 and there has been research with the same circular, namely the OJK Circular No. 06 / D.05 / 2013, the recommendation from KPPU to OJK is to revoke the lower limit tariff, because it is considered contrary to the principle of fair business competition. Obstacles faced by the Business Competition Supervisory Commission (KPPU) regarding OJK Circular No. 6/SEOJK.05/2017 in Pekanbaru City.

I. Introduction

The essence of Law number 5 of 1999 definitely requires supervision on its implementation. The enactment of Law number 5 of 1999 on Prohibition of

Monopolistic Practices and Unfair Business Competition as the basis for competitive policy, followed by the establishment of Business Competition Supervisory Commission (KPPU) to ensure and supervise compliance with the provisions of Anti-monopoly Law.¹

KPPU is an independent supervisory agency, appointed by the president where in its duties KPPU handles, decides or conducts investigations of a case which cannot be influenced by any party, either the government or other parties who have a conflict of interest, even though in carrying out its authorities and duties it is directly responsible to the president. KPPU is also a quasi-judicial institution that has executive authority related to business competition cases.

In general, a financial institution is legal entity which engaged in finance, collecting funds, distributing funds or both. In accordance with the rate of economic growth and the movement of development of a nation. "Financial Services Authority (OJK) is an independent institution, which in carrying out its duties and authorities is free from interference from other parties, except for matters explicitly regulated in Law number 21 of 2011". "OJK has the aim that all activities in the financial services sector are carried out in an orderly, fair, transparent and in accountable manner and able to realize a financial system that grows in a sustainable and stable manner and able to protect the interests of consumers and the public". OJK functions as an integrated regulatory and supervisory system for all activities in the financial services sector. In Law number 21 of 2011 on Financial Services Authority, there is no explanation on OJK's duties in setting premium rates for insurance but the one who can determine property insurance premium rates is National Insurance Data Center Management Agency (BPPDAN) but with the issuance of OJK Circular Letter number 6/SEOJK.05/2017 which contradicts Law number 21 of 2011 on the Financial Services Authority and Law number 5 of 1999 on Monopoly Practices and Unfair Business Competition. The policy of setting a lower limit on insurance premium rates has a contrary nature to the principle of fair business competition because tariff limit often becomes an entry barrier for efficient insurance companies to offer their competitiveness in form of competitive premium rates, which are very likely to be below the limit.

¹ Rachmadi Usman, 2013, *Hukum Persaingan Indonesia*, Jakarta: Sinar Grafika, hal 49

In the perspective analysis of fair business competition, the problem of lower tariff limit lies in determining the amount of the lower limit. Generally, the lower limit is set with aim to protect all business actors in the industry without exception, including those who are inefficient and tend to be burden on the industry in the long term. The lower limit will greatly benefit efficient business actors who should offer the competitive rates they would otherwise receive.

There is a change in risk and loss profile of motor vehicle and property insurance so that the current premium rate needs to be reviewed within a certain period to ensure its adequacy against the risks borne by the insurance company. This regulation contains the determination of premium rates or contribution fee in the property business line, motor vehicle insurance, special risks of flooding in motor vehicle insurance and property insurance business lines, special earthquake risks in motor vehicle insurance and property insurance business lines. "This regulation replaces the previous regulation, which is circular letter of OJK number 21/SEOJK.05/2015 on Determining Premiums or Contribution fees to Property Insurance and Motor Vehicle Insurance Business Lines in 2015. The substance of changes to these regulations include:

1. Regulation on giving premium/contribution discount for property business line;
2. Property insurance coverage with period more or less than 12 months;
3. Motor vehicle coverage with period more than 12 months;
4. Regulation on giving premium/contribution discount for motor vehicle insurance;
5. Regulation on acquisition cost;
6. Regulation for property insurance and earthquake insurance with value coverage more than USD1 billion²

For motor vehicle premium rates, it is divided into 3 (three) different regions because based on statistical data the level of accident risk in each region is different, namely:

1. Region 1 : Sumatera and surrounding islands
2. Region 2 : DKI Jakarta, West Java and Banten, and
3. Region 3 : Other than region 1 and region 2³

Online application-based transportation is a transportation service that can be accessed online via a smartphone.⁴ The government's goal is to establish

² (<https://jabar.tribunnews.com/2017/04/23/ojk-keluarkan-kebijakan-tentang-tarif-premi-berikut-isi-aturannya>)

³ (<https://jabar.tribunnews.com/2017/04/23/ojk-keluarkan-kebijakan-tentang-tarif-premi-berikut-isi-aturannya>)

⁴ Slaudiya anjani, Septi Damayanti "Transportasi Berbasis Aplikasi Online: Sebagai sarana transportasi masyarakat Surabaya," *Komunitas* 6, no. 3 (2017): hlm. 1–21

regulations regarding online transportation fares to ensure equality. That is, the Government provides equal opportunities and chances for both conventional and online transportation models in transportation services in Indonesia. This is in line with Yusuf Wibisono's theory which states that there are three important principles in partnership, namely equality, transparency and mutual benefit. Policy setting that has been done unilaterally can create conflicts in terms of partnerships. As the fare policy is determined unilaterally will result nothing but negative for the driver as the partner. Each policy is set regarding the amount of fare will have an impact on providers, drivers and passengers. High or low fares will affect the interest consumers to use the service of online driver which will result the sustainability of the online driving company itself.

Enforcement of lower and upper limit of fares for online motorcycle taxi transportation to protect consumers and continuity the business of applicator providers and their partners (drivers). The upper limit is applied so that drivers will get sufficient income and a healthy competition is realized between conventional transportation and online transportation.⁶ With the determination of online transportation fares, customers cannot be charged for fees outside the upper and lower limit ranges by online motorcycle taxi drivers. The following are the implications and risks of determining online motorcycle taxi fares based on Permenhub number 12 of 2019, including:

1. The determination of tariffs and obligations is applied relatively the same, this has an effect on the level of healthy competition between conventional motorcycle taxis and online motorcycle taxis. Both will always compete by providing creative and innovative services. By not applying low rates to win the competition. The end result is to make the customers as the winner, because there are various alternative service options that they can choose.
2. With the existence of a legal basis on online transportation, it provides income to the country in the form of taxes, which are used for the development of the country.
3. The predetermined tariff aims to avoid a widening gap between companies and to provide certainty and comfort for consumers.
4. The upper limit of fares for online transportation is made to protect consumers, usually during peak hours the service for online transportation will be more expensive and for the lower limit, it aims to protect the income of online taxi drivers.
5. Besides the benefits above, determining online taxi driver rates can also cause risks for the drivers. One of the risks is customers always choose to use the service of the other online motorcycle taxi companies which

are cheaper.

6. Characteristics of transportation fares are grouped based on its variable costs, fixed costs, joint costs, and common costs⁵. This is in line with theory delivered by Laksono which stated that transportations fares are divided into three groups, which are fixed cost, variable cost, and overhead cost⁶. Or in other words, it can be said as access cost and material cost⁷. The material costs are as follows
 - a) Transportation cost
 - b) Advertising cost
 - c) Finding cost
 - d) Permit fees.
7. Variable cost can change according to activities. Variable cost in transportation are generally calculated in per kilometer per unit weight. Types of these variable costs include: driver service, fuel, and maintenance costs.⁸

With problems above, this research becomes interesting when discussing OJK Circular Letter number 6/SEOJK.05/2017 in relation to government policy regarding the policy of determining a lower limit on insurance premium rates has a spirit that is contrary to the principle of fair business competition based on Law number 5 of 1999 of Monopolistic Practices and Unfair Business Competition. Therefore, the researcher formulated the title to be "Perspective Analysis of Business Competition Supervisory Commission (KPPU) regarding 2017 OJK Circular Letter number 6/SEOJK.05/2017 in Pekanbaru City".

Problem Formulation what is the perspective analysis of Business Competition Supervisory Commission (KPPU) regarding 2017 OJK Circular Letter number 6/SEOJK.05/2017 in Pekanbaru City?; What is the problems faced by Business Competition Supervisory Commission (KPPU) regarding 2017 OJK Circular Letter number 6/SEOJK.05/2017 in Pekanbaru City?

⁵ Zaroni, "Penetapan Tarif Transportasi" (Jakarta, 2017), supplychainindonesia.com/new/download/386/

⁶ Raden Aji Laksono, Imam Basuki, and Y. Lulie, "Analisis Biaya Operasional Kendaraan (Bok) Dan Tingkat Okupansi Angkutan Taksi Daerah Istimewa Yogyakarta," *Jurnal Teknik Sipil* 13, no. 3 (2017): hlm. 196–205.

⁷ Alief Rakhman Setyanto, "Kajian Determinan Biaya Transaksi Taksi Konvensional Dengan Biaya Transaksi Taksi Online."

⁸ Handy Nugroho and Ratna Purwaningsih, "Analisis Tarif Berdasarkan Biaya Operasional Kendaraan (Bok) Dan Willingness To Pay (Wtp) Pada Bus Akap Kelas Executive (Studi Kasus : Bus Rosalia Indah Kelas Executive Jurusan Solo – Jabodetabek)," *Jurnal Teknik Industri* 10, no. 10 (2015): hlm. 1–10

Purposes explains about perspective analysis of Business Competition Supervisory Commission (KPPU) regarding 2017 OJK Circular Letter number 6/SEOJK.05/2017 in Pekanbaru City; Explains about obstacles faced by Business Competition Supervisory Commission (KPPU) regarding 2017 OJK Circular Letter number 6/SEOJK.05/2017 in Pekanbaru City .

2. Research Method

This research is a sociological legal research and used a positive law enforcement approach to society. The use of sociological legal research is to find out how the law is implemented, including the law enforcement process. This is because sociological legal research can reveal the problems behind the implementation and enforcement of the law

3. Results and Discussion

A. Perspective Analysis of Business Competition Supervisory Commission (KPPU) regarding 2017 OJK Circular Letter number 6/SEOJK.05/2017 in Pekanbaru City

Business Competition Supervisory Commission or KPPU is an independent institution established to oversee the implementation of Law number 5 of 1999 on Prohibition of Monopolistic Practices and Unfair Business Competition. KPPU is responsible to the President. There are 9 commissioners of KPPU, appointed by the President of Indonesia based on the results of the House of Representatives of the Republic of Indonesia. Law number 5/1999 explains that the duties and authorities of KPPU are as follows:

Duties

1. Evaluates the agreements that may result in monopolistic practices and or unfair business competition as regulated in Articles 4 to 16;
2. Assesses of business activities and or actions of business actors that may result in monopolistic practices and or unfair business competition as stated in Article 17 to Article 24;
3. Assesses the presence or absence of abuse of dominant position which may result in monopolistic practices and or unfair business competition as regulated in Articles 25 to 28;
4. Takes action in accordance with the authority of KPPU as regulated in Article 36;

5. Provides advices and considerations on government policies related to monopolistic practices and or unfair business competition;
6. Compiles guidelines and or publications related to this Law;
7. Provides periodic reports on the work of KPPU to the President and the House of Representatives.

Authorities

1. Receives reports from the public and or from business actors regarding the alleged occurrence of monopolistic practices and or unfair business competition;
2. Conducts research on the alleged business activities and or actions of business actors that may result in monopolistic practices and or unfair business competition;
3. Conducts an investigation and or inspection of cases of alleged monopolistic practices and or unfair business competition reported by the public or by business actors or found by the Commission as a result of its research;
4. Concludes the results of the investigation and or inspection regarding the presence of monopolistic practices and or unfair business competition;
5. Summons business actors suspected violating the provisions of this law;
6. Summons and presents witnesses, expert witnesses, and anyone deemed aware of the violation of the provisions of this law;
7. Requests assistance from investigators to present business actors, witnesses, expert witnesses, or any person as referred to in point 5 and 6, who are not willing to comply with the Commission's summons;
8. Requests information from government agencies in relation to investigations and or inspections of business actors who violate the provisions of this law;
9. Obtains, examines, and or evaluates letters, documents, or other evidence for investigation and or inspections;
10. Decides and determines whether or not there is a loss on the part of other business actors or the community;
11. Notifies the Commission's decision to business actors suspected of conducting monopolistic practices and or unfair business competition;
12. Imposes sanctions in the form of administrative actions to business actors who violate the provisions of this Law.

Insurance in Indonesia is closely related to the Financial Services Authority (hereinafter abbreviated as OJK), which is an independent state institution that has the authority to supervise, regulate, examine and investigate all activities and traffic of financial services, as regulated in Law number 21 of

2011 on Financial Services Authority (hereinafter abbreviated as UU OJK law). Based on Article 1 number (7) of OJK law, the Insurance Business has been taken over, specifically on its regulations by OJK according to its authority stated in the law. In 2013 OJK issued Circular Letter Number SE-06/D.05/2013 (hereinafter abbreviated as Circular Letter of OJK on Motor Vehicles) concerning Determination of Premium Rates and Provisions for Acquisition Costs in the Motor Vehicle and Property Insurance Business Line and Types of Special Risks Including Floods, Earthquake, Volcanic Eruption and Tsunami in 2014. The contents of this Circular Letter contain and regulate insurance activities in the Loss Insurance business line, either Motor Vehicle Loss or Property Loss.

KPPU has not conducted an assessment regarding OJK circular letter number 6/SEOJK.05/2017 concerning the determination of tariffs or contributions to the property and motor vehicle insurance business lines stipulated by OJK on January 26, 2017. However, we need to convey that KPPU has conducted a study on OJK Circular Letter number 06/D.05/2013 dated December 31, 2013 regarding the determination of premium rates and provisions for acquisition costs in motor vehicle and property insurance business lines as well as types of special risks including flood, earthquake, volcanic eruption, and tsunami in 2014 (OJK circular letter number 06/D.05/2013). Whereas the results of KPPU's study regarding OJK circular letter number 06/D.05/2013, among others, concludes the following points:

- a. The policy of determining a lower limit on insurance premium rates has a contrary nature to the principle of fair business competition, because the lower limit rates often become an entry barrier for efficient insurance companies to offer their competitiveness in the form of competitive premium rates, the amount of which is very likely to be within below the lower limit.
- b. In Perspective Analysis of fair business competition, the problem of the lower limit tariff lies in determining the amount of the lower limit
- c. Generally, the lower limit is set with the aim to protect all business actors in the industry without exception, including those who are inefficient and tend to become a burden on the industry in the long term.
- d. The lower limit will greatly benefit efficient business actors, who should offer competitive rates. But at the same time consumers will be victims of not being able to get the competitive rates they should receive
- e. KPPU suggests that applicable tariff in insurance industry will provide a space for healthy competition to create efficient business actor that will give benefits for consumers as a whole
- f. KPPU concludes that OJK does not need to set a lower tariff limit,

- g. KPPU suggests that OJK regularly publish a list of insurance companies based on the level that can guarantee the safety of their consumers, so that consumers can choose insurance companies with the best consideration.
- h. Based on the results of KPPU's study regarding OJK circular letter number 06/D.05/2013, the recommendation from KPPU to OJK is to revoke the lower limit tariff, because it is considered contrary to the principle of fair business competition.

Financial Services Authority (OJK) is an independent institution that has the functions, duties, and authorities of regulation, supervision, inspection, and investigation. OJK was established based on Law Number 21 of 2011 which functions to organize an integrated regulatory and supervisory system for all activities in the financial services sector. OJK was established to replace the role of Capital Market and Financial Services Supervisory Body (BAPEPAM LK) in regulating and supervising the capital market and financial institutions, as well as replacing the role of Bank Indonesia in regulating and supervising banks, as well as to protect consumers of the financial services industry.

According to the chief executive of non-bank OJK, Head of OJK Riau Yusri, explained that the rules of OJK Circular Letter Number SE-06/D.05/2013, which was later updated with the OJK Circular Letter Number 06/SEOJK.05/2017, were issued based on the results of intensive discussions together with insurance companies and insurance industry actors, the purpose of the circular letter is to protect the public interest from imposing excessive premiums and while setting lower rates is intended to prevent inadequate premium rates which can cause insurance companies to be unable to pay liability at the time of the claim. The circular letter received criticism from KPPU because it was seen as having the potential for unfair business competition, KPPU found that almost all insurance companies set their premium rates at the lower limit, this shows that the lower limit rate is adequate and competition does not occur because the company and OJK circular letter number SE.06/D.05/2013 which was later updated with SE 06/SEOJK.05/2017 does not violate the article on price fixing, namely Article 5, Article 6, Article 7, Article 8 and does not comply with the cartel element as stated in Article 11 of Law number 5 of 1999 because OJK circular letter is not a business actor. Talking about whether this circular is effective or not, OJK recently found two general insurance companies that were caught still providing engineering fees to insurance brokers. This violation was found by OJK and mentioned on their 2019 financial report. As for those who violated the circular letter, both of them provide engineering fees on motorcycle insurance products and that is contrary to circular letter number 06/SEOJK.05/2017.

"This Circular letter is issued considering the principle in Article 20 of Government Regulation number 73 of 1992 in conjunction with Government Regulation number 81 of 2008 concerning Insurance Business that premiums must be set at a sufficient level, not excessive and not applied in a discriminatory manner, and in Article 19 of the Ministerial Decree of Finance (Kepmenkeu) number 422/KMK.06/2003 that premiums must be calculated based on a risk and loss profile for at least five years".⁹ Determination of premium rates set by OJK Circular letter for Motor Vehicles is divided based on 3 (three) regional classifications of premium rates. The rate is calculated from the Risk Profile of each of these regions, so that each region has different rates. In its implementation, this OJK circular letter for Motor Vehicles is accompanied by an explanation on how to organize and regulate the OJK circular letter for Motor Vehicles, known as Frequently Asked Questions (FAQ). "The incompatibility of the insurance premium rates paid with the amount of the risk profile covered is based on the vehicle's operating area. This happens because the calculation of the premium rate for the vehicle area is based on the plate number of the origin of the vehicle, causing losses for the insurer. Based on the OJK circular letter for motor vehicles, the determination of premium rates is applied so as not to cause harm to both parties (Number 12, Attachment II FAQ of the OJK Motor Vehicle Circular) but in practice this uncertainty makes it difficult to apply premium rates from the OJK circular letter for motor vehicles by insurance business actors, because it is not in accordance with the intent and purpose of this Circular Letter and also causes losses." (<http://hukum.studentjournal.ub.ac.id/index.php/hukum/article/view/1033/1021>).

B. Problems Faced by Business Competition Supervisory Commission (KPPU) regarding 2017 OJK Circular Letter number 6/SEOJK.05/2017 in Pekanbaru City

Business Competition Supervisory Commission ("KPPU") is a special organ that has a dual task, apart from creating order in business competition, it also plays a role in creating and maintaining a conducive business competition climate. KPPU has the function of law enforcement, especially Business Competition Law, but KPPU is not a special judicial institution for business competition. Thus, KPPU is not authorized to impose sanctions, both criminal and civil. The position of KPPU is more of an administrative institution because the authority attached to it is administrative authority, so that the sanctions imposed are administrative sanctions.

⁹ Abdulkadir Muhammad, 2006, *Hukum Asuransi Indonesia*, Jakarta: Rajawali Pers, hal 70

KPPU is given the status as supervisor of the implementation of Law number 5/1999 on the Prohibition of Monopolistic Practices and Unfair Business Competition. Its legal status is as an independent institution that is independent from the influence and power of the Government and other parties. KPPU members are appointed and dismissed by the President with the approval of the House of Representatives. Members of KPPU in carrying out their duties are responsible to the President. This is in line with the practice in America where the FTC is accountable to the President. This provision is reasonable because KPPU carries out part of the government's duties, while the highest power of government is under the President. However, it does not mean that KPPU in carrying out its duties cannot be free from government interference. Independence is maintained with the involvement of the House of Representatives to participate in determining and controlling the appointment and dismissal of KPPU members. Previously, OJK through circular letter number 6/SEOJK.05/2017 concerning Determination of Premium Rates and Provisions for Acquisition Costs for Motor Vehicle and Property Insurance emphasizes to the directors and commissioners of the members of the Indonesian General Insurance Association (AAUI) that they have expressed their commitment to comply with OJK circular letter number 6/SEOJK.05/2017, and if there is a violation of OJK circular letter number 6/SEOJK.05/2017, there will be a sanction and if the violation is severe, their business license could be revoked. But first, let's see the impact of the violation on the company or industry. If the impact on the company is massive, the regulator will revoke the license for its products, either motorcycles or property. However, if it is not significant, they will be prohibited to run their business for a certain period of time. OJK can also monitor the company by requiring general insurance companies to report certain things every month. In addition, for the next financial report, OJK will ask the public accounting firm (KAP) to investigate the audit of motor vehicle and property product, especially regarding Circular Letter number 6/SEOJK.05/2017 and will find out the violations that exist in the KAP report. Insurance companies that violate will be subject to administrative sanctions in the form of a written warning, cancellation of business activities, or even the revocation of the business license.

4. Conclusion

Due to the absence of a study on the results of study of OJK circular letter number 6/SEOJK.05/2017 and there is a study with the same circular, namely regarding the OJK circular letter No. 06/D.05/2013, the recommendation from KPPU to OJK is to revoke the lower limit tariff, because it is considered contrary

to the principle of fair business competition. Obstacles faced by Business Competition Supervisory Commission (KPPU) regarding OJK circular letter number 6/SEOJK.05/2017 Year 2017 in Pekanbaru City, among others, KPPU has a law enforcement function, especially Business Competition Law, but KPPU is not a judicial institution especially business competition. Thus, KPPU is not authorized to impose sanctions, both criminal and civil. The position of KPPU is more of an administrative institution because the authority attached to it is administrative authority, so that the sanctions imposed are administrative sanctions.

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