

Legal Analysis of the Role of Notaries in the Process of Risk-Based Licensing Digitalization Through Oss-Rba

Tsabita Ritza Aurelia¹⁾ & Jawade Hafidz²⁾

¹⁾Master of Notary Law, Faculty of Law, Universitas Islam Sultan Agung (UNISSULA) Semarang, Indonesia, E-mail: tsabitaritzaaurelia@gmail.com

²⁾Master of Notary Law, Faculty of Law, Universitas Islam Sultan Agung (UNISSULA) Semarang, Indonesia, E-mail: jawade@unissula.ac.id

Abstract. *This study aims to analyze: 1). The role of notaries in the process of digitalizing risk-based licensing through OSS-RBA. 2) Obstacles and solutions in the process of digitalizing risk-based licensing through OSS-RBA. This type of research is empirical legal research. The approach method in this study is a sociological juridical approach. The types of data in this study are primary data and secondary data. The data collection method uses interviews and literature studies. The analysis in this study is qualitative. The results of the study concluded: 1) The role of notaries in the process of digitalizing risk-based licensing through OSS-RBA is as a guarantor of the certainty and validity of legal documents that form the basis for establishing a business entity as well as the main requirement in obtaining a Business Identification Number (NIB) and other permits. Although the OSS-RBA system is present as a digital instrument that simplifies and accelerates business licensing services, the function of notaries remains irreplaceable because their attributive authority is sourced from the Notary Law (UUJN) to make authentic deeds. In Sukoharjo Regency, which is dominated by MSMEs, notaries also act as a bridge between legal literacy and digital administration, assisting business actors in understanding, preparing, and ensuring the validity of documents required in the OSS-RBA system. 2) Obstacles in the process of digitizing risk-based licensing through OSS-RBA are not only technical, such as limited technological infrastructure and low digital literacy among business actors, but also normative, namely unclear procedures, overlapping regulations, and too rapid policy changes that create legal uncertainty. Possible solutions include improving coordination between agencies, drafting more consistent regulations, technical assistance for business actors, and the role of notaries in guaranteeing the validity of legal documents and maintaining data accuracy in the OSS-RBA system. When analyzed using Gustav Radbruch's theory of legal certainty, OSS-RBA-based licensing should be able to ensure that the law is clear, consistent, and can be implemented without causing doubt. According to Radbruch, legal*

certainty is one of the fundamental values of law besides justice and utility. Legal certainty can only be realized if implementing regulations are stable, administrative procedures are integrated, and mechanisms for resolving obstacles can be implemented effectively.

Keywords: Digitalization; Licensing; Notary.

1. Introduction

Digitalization has driven the creation of a bureaucratic system that is more open, efficient, and responsive to public needs. In the context of governance, the application of information technology enables the government to accelerate decision-making processes, increase transparency, and eliminate cumbersome bureaucratic processes. One sector experiencing significant changes due to advances in information technology is business licensing services. Previously dominated by a manual system prone to delays and maladministration, the licensing process has now shifted to a more integrated, data-driven electronic system. This digitalization of licensing not only involves shifting from conventional to online services but also reflects structural reforms in how the government facilitates economic activity and investment.

Conceptually, business licensing is the granting of legal authority to an individual or business actor and certain activities, either in the form of a permit or a business registration certificate. Permits are one of the instruments frequently used in the context of administrative law to direct public behavior.¹In practice, in accordance with Law Number 30 of 2014 concerning Government Administration, permits are granted to parties who apply for them in the form of a decision by an authorized government official as a form of approval of the request of community members.²Licensing is a government/regional government (Pemda) policy instrument for controlling negative externalities that may arise from social and economic activities. Licensing also provides legal protection for ownership or operation of activities. As a control instrument, licensing requires clear rationale and is enshrined in government policy as a reference.³

The transformation of information technology is increasingly evident with the introduction of the Online Single Submission (OSS) system, specifically the Risk-Based OSS (OSS-RBA), which is designed to provide convenience, speed, and legal certainty in processing business permits throughout Indonesia.

¹Fathoni and S. Tisnanta, 2018, Construction of the Meaning of Permits as a Control Instrument Versus Investment Facilitation Policy in Lampung Province, Jurnal Hukum Peratun, Vol. 1, No. 1, pp. 84-87.

²Yunandi Permana, 2023, Implementation and Constraints in the Risk-Based Electronically Integrated Business Licensing Process, SELISIK Journal, Volume 9, Number 2, p. 183

³Adrian Sutedi, 2010, Licensing Law: In the Public Service Sector, Sinar Grafika, Jakarta, p. v

Electronically Integrated Business Licensing or Online Single Submission (OSS) is a Business Licensing issued by the OSS Institution for and on behalf of ministers, heads of institutions, governors, or regents/mayors to Business Actors through an integrated electronic system as regulated in Government Regulation Number 24 of 2018 concerning Electronically Integrated Business Licensing Services. With the issuance of PP No. 24/2018, all laws and regulations that are hierarchically lower than Government Regulations such as Presidential Regulations, Ministerial Regulations, Institutional Regulations, Regional Regulations, and Regional Head Regulations must follow and adjust to the OSS system. In its development, Government Regulation Number 24 of 2018 concerning Electronically Integrated Business Licensing Services was revoked and replaced by Government Regulation (PP) Number 28 of 2025 concerning the Implementation of Risk-Based Business Licensing.

The primary objective of establishing the OSS is to standardize licensing services, leading to greater ease of doing business throughout Indonesia. The OSS is expected to simplify the list of procedures used in the EODB index to assess business start-up indicators. The Business Identification Number (NIB), for example, is one deregulation measure through a merger strategy.⁴

Based on Law Number 6 of 2023, business licensing procedures have changed to a risk-based approach. Risk-based business licensing is a mandatory permit for businesses, granted based on the scale of the business, risks, and an analysis of the potential impacts of the business activity. This includes a Business Identification Number (NIB), a Standard Certificate, and a Permit. The type of business activity will influence the type of business permit required of the business actor.

Amidst these regulatory changes, the role of notaries has become crucial, especially in the process of establishing a business entity, which is one of the main prerequisites before business actors can access the OSS-RBA system. A notary is a public official authorized to make authentic deeds and other authorities as referred to in Article 1 Paragraph (1) of Law Number 2 of 2014 concerning amendments to Law Number 30 of 2004 concerning the Position of Notary. In the explanation, it is stated that a notary is a public official authorized to make authentic deeds as long as the making of certain authentic deeds is not specifically for other public officials. The need for written agreements to be

⁴Slamet Mulyono, 2023. Updating Structured Business Licensing Law from the Perspective of the Provincial Government of the Special Capital Region of Jakarta, *JHHHP: Journal of Law, Humanities and Politics*, Vol. 3, No. 2, p. 43

made before a notary is to guarantee legal certainty and to fulfill strong evidentiary laws for the parties entering into the agreement.⁵

In carrying out their duties, notaries provide the best possible service to those who require their services. Notaries also provide legal counseling to their clients to foster a high level of legal awareness, enabling them to understand and internalize their rights and obligations as citizens and members of society.⁶Notaries have the authority to draw up deeds of establishment of business entities and process legal entity approval through the Ministry of Law and Human Rights, which is the gateway for registration in the OSS system.⁷Furthermore, in practice, many business actors still require legal assistance from notaries in understanding the legal and technical aspects of the digital-based OSS-RBA.⁸

In Sukoharjo Regency, Central Java, the implementation of the Online Single Submission Risk-Based Approach (OSS-RBA) system is highly relevant, given that the region is known as a hub for small and medium-sized industries, such as textiles, agriculture, and manufacturing, which contribute significantly to the local economy. The digitalization of business licensing through the OSS-RBA aims to provide convenience and acceleration for businesses, but in practice, it faces various challenges, particularly related to the role of notaries.

2. Research Methods

This research is empirical legal research. The approach used is a sociological-juridical approach. The data used are primary and secondary data. Data collection methods include interviews and literature review. The analysis is qualitative.

3. Results and Discussion

3.1. The Role of Notaries in the Digitalization Process of Risk-Based Licensing Through OSS-RBA

The era of digitalization that is developing rapidly in the fields of technology, information, and communication has also influenced the implementation of internet-based government (electronic government) both at the central and

⁵Abdul Jalal, Suwitno, Sri Endah Wahyuningsih, Involvement of Notary Officials in Unlawful Acts and Participation in Criminal Acts in Document Forgery, *Jurnal Akta*, Volume 5 Number 1 March 2018, p. 228

⁶Ndaru Satrio, Legal Analysis of the Criminal Act of Providing False Information in an Authentic Deed as Referred to in Article 266 Paragraph (1), *LEX Certa Journal*, Volume 1 Number 1 2016, p. 97

⁷Chita Herdiyanti. 2017, *Legal Politics of Agrarian Reform in the National Land Law System*, UII Press, Yogyakarta, p. 49.

⁸Zainal Asikin. 2018, *Principles of Indonesian Commercial Law*, Rajawali Pers, Jakarta, p. 133.

regional levels, thus encouraging the creation of convenience in providing services to the public.⁹The view that bureaucracy is wasteful, inefficient, and slow is being dismantled through bureaucratic reform. E-government provides public services that are accessible 24/7 to anyone, anytime, and from anywhere, such as the online business licensing application called Online Single Submission (hereinafter referred to as OSS), which aims to simplify business licensing.¹⁰

Sukoharjo Regency, as one of the regions in Central Java Province, has an economy dominated by small and medium-sized industries, agriculture, and trade, with a focus on increasing investment and ease of doing business to support local growth. Sukoharjo Regency has also implemented integrated business licensing services from the central government through one (1) Electronic Business Licensing System, the Online Single Submission (OSS), to obtain business permits. The agency authorized to provide licensing and non-licensing services under the authority of the regional government in Sukoharjo Regency is the Investment and One-Stop Integrated Services Agency (DPMPTSP). OSS-RBA is an improvement on the business licensing system in Indonesia, which was initially regulated in Government Regulation Number 5 of 2021, but was later revoked and replaced by Government Regulation Number 28 of 2025 concerning the Implementation of Risk-Based Business Licensing.

The implementation of licensing services in Sukoharjo Regency itself still leaves various problems, where most people are still not used to registering online and are afraid of making mistakes in filling in (inputting) data, finally the registration process is carried out manually by coming to the Investment and One-Stop Integrated Services Office (DPMPTSP) of Sukoharjo Regency.¹¹

Since the implementation of the 2020 Job Creation Law and Government Regulation No. 28 of 2025, Sukoharjo has adopted the OSS-RBA (Online Single Submission Risk-Based Approach) system as the primary digital platform for risk-based business licensing, aiming to expedite the licensing process while considering the level of business risk. This is reflected in the efforts of the local government, through the Sukoharjo Investment and One-Stop Integrated Services Agency (DPMPTSP), which actively conducts outreach and surveys on public satisfaction with licensing services. Survey results from the first semester of 2022 showed a high level of satisfaction with the ease of access to the OSS-RBA. Furthermore, the revised 2022 Sukoharjo Regional Government Work Plan (RKPD) mentions the integration of the OSS-RBA for risk mitigation and a green economy, demonstrating the region's commitment to digitalizing licensing to

⁹Haura Atthahara, 2018, E-Government Based Public Service Innovation: Case Study of Ogan Lopian Dinas Application, *Jurnal Politikom Indonesiana*, volume 3 number 1, p.77.

¹⁰Seto Sanjoyo, 2020, Business Licensing Through Online Single Submission as Legal Compliance in Order to Increase Investment, *Borneo Law Review*, volume 4 number 1, p. 72.

¹¹Interview with Mr. Joko, an official at the Investment and PTSP Office of Sukoharjo Regency, July 25, 2025

attract investment, despite challenges such as digital literacy among MSMEs remaining a key issue.⁴

The government introduced the Online Single Submission (OSS) service for joint licensing services, making it easier for businesses to obtain permits. Recent developments have shown that the Online Single Submission (OSS) system needs to be connected with other government systems, including the Directorate General of Taxes (DGT). As an electronic integration system, it will handle all company licensing services, which are the responsibility of Ministers/Heads of Institutions, Governors, or Regents/Mayors.¹²

Online Single Submission (OSS) is a system capable of integrating business licensing electronically and also provides online electronic services to business actors and/or investors. The OSS system is intended to facilitate business actors in obtaining legal business permits. Now through the OSS page, business actors are given easy access to information and clarity of procedures. This OSS website provides information such as business application data, existing permit data, regional agency data, regional permit data, and others. There are still many things that need to be prepared in implementing e-government-based business licensing services aimed at the public. One of them is the readiness of the server for the Online Single Submission (OSS) system when used, so that it will not give rise to the thought that the Online Single Submission (OSS) system is unfeasible.¹³

The mechanism for submitting an application for the above permit in the Online Single Submission (OSS) system is as follows:

- 1) Create user-ID
- 2) Log-in to the OSS system using user-ID
- 3) Fill in the data to obtain a Business Identification Number (NIB)
- 4) Furthermore, business actors can apply for a business permit for the business activities they carry out.
- 5) Once a business actor, whether an individual or a business entity, has selected a business activity that aligns with the KBLI, they can apply for a business permit. This is because when inputting data for the business activity for

¹²Imam Sucahyo, Husni Mubaroq, Robbiyatul Adawiyah. Implementation of the Online Single Submission (OSS) Program in Micro-Business Licensing Services at the Investment and One-Stop Integrated Services Office in Probolinggo Regency in the New Normal Era, *Scientific Journal of Politics, Policy, & Social Affairs (Publicio)*, Vol. 4, No. 2, July 2022, p. 139

¹³Imam Muazansyah, 2020, 'Application of Online Single Submission (OSS) Innovation in the Integrated Investment and Service of Bulungan District', *Scientific Journal of Public Administration*, Vol. 18 No. 1, p. 91.

which a permit is being requested into the OSS system, the type of business must be entered with a 5-digit code in accordance with the KBLI.

6) Provide a checklist as proof of agreement to the statement regarding the truth and validity of the data entered (disclaimer).

7) Once a business's NIB has been issued, the business owner can then apply for a business permit and commercial permit. During the application process, the business owner enters data on their planned business activities. Once the business owner has completed inputting their business data, the Business Permit and Commercial Permit are issued immediately upon completion of the data entry process in the OSS system. Therefore, the NIB, Business Permit, and Commercial Permit are issued on the same day after all data entry and requirements are completed.

The success of the OSS implementation depends not only on the sophistication of the electronic system used, but also on the validity and accuracy of the legal documents used to apply for business permits. In this regard, notaries play a crucial and inseparable role in the OSS system, as they are authorized to draft the legal entity's deed of establishment. This deed is a primary requirement for obtaining a Business Identification Number (NIB) and serves as the gateway to accessing other permits.

The position of a notary as an official who makes authentic deeds is stated in Article 2 Paragraph 1 of Law Number 2 of 2014 concerning Amendments to Law Number 30 of 2004 concerning the Position of Notary, which states that a Notary is a public official who is authorized to make authentic deeds and has other authorities as referred to in this Law or based on other laws. Authentic deeds made by or before a notary according to the form and procedures stipulated in the law.¹⁴

The authority vested in a notary public does not derive from other government institutions, but rather is based on and granted by law. Therefore, the authority held by a notary public is attributional authority. In the duties and responsibilities of a The notary in making an authentic deed aims to provide legal certainty in carry out certain legal acts carried out by the community. The community often times carrying out various activities that give rise to legal actions, therefore society needs someone who can be trusted and can provide something solutions in legal actions carried out by the community.¹⁵

The authority to make authentic notary deeds also includes the authority to

¹⁴Nawaaf Abdullah, Munsyarif Abdul Chalim, 2017, The Position and Authority of Notaries in Making Authentic Deeds, *Jurnal Akta*, Vol. 4 No. 4, p. 658

¹⁵Daniar Ramadhan and Ngadino, 2019, The Authority of Notaries in Making Deeds Related to Land, *Jurnal Notarius*, Volume 12 Number 2. p.686

make deeds of establishment of business entities. Notaries play a strategic role in the risk-based business licensing system through the Online Single Submission (OSS) system, as they serve as the first line of defense, ensuring the legality of a business entity before the electronic licensing process can proceed. The role of notaries in the digitalization of risk-based licensing through the OSS-RBA system in Sukoharjo Regency is as follows:

1) *Gatekeeping* Legality of Business Entity

A notary is the primary gateway to ensuring the legality of a business entity before it can be integrated into the OSS-RBA. Within the OSS-RBA system, a notary acts as the gatekeeper for business entity legality. Nearly all deeds of incorporation for Limited Liability Companies, cooperatives, and foundations seeking to register for the OSS-RBA must be submitted through a notary, as the system will reject applications without the legal entity certification document from the AHU. Therefore, a notary's role extends beyond drafting deeds and ensuring the legal entity's legality before it can be incorporated into the OSS.

Before a business entity can be registered in the OSS-RBA system, a notary must first draft a deed of establishment or articles of association in accordance with applicable formal legal provisions. This deed includes verification of the founders' competency, identity data consistency, clarity of capital structure, and the existence of company organs as required by law. Once the deed is completed, the notary handles the legal entity's ratification through the Directorate General of General Legal Administration (AHU) of the Ministry of Law and Human Rights. In this way, the notary ensures that the data and legal documents entered into the OSS-RBA are legal and valid, thus minimizing system rejections due to document discrepancies during the OSS-RBA's automatic cross-checking.

2) Data Validation and Data Hygiene

One of the important roles of a notary in the OSS-RBA is to validate data while maintaining data hygiene. This includes determining the 5-digit Indonesian Standard Industrial Classification (KBLI), mapping business activities against risk levels, and aligning management and shareholder data with the deed of establishment and the results of the AHU (Authorization and Business Unit) approval. The notary's accuracy at this stage is crucial, as data inconsistencies often cause administrative disruptions in the licensing process. Therefore, the notary's role is not only administrative, but also technical in ensuring the quality of data input. Legal and business research shows that the administrative order produced by notaries contributes to a reduction in "reject" or "hold" cases when the OSS-RBA system performs risk profiling.¹⁶

¹⁶RA Chita Herdiyanti, 2017, *Legal Politics of Agrarian Reform in the National Land Law System*, UII Press, Yogyakarta, p. 49

3) The Bridge between Digital Literacy and Legal Literacy

In many regions, particularly those dominated by Micro, Small, and Medium Enterprises (MSMEs), business owners still face limited digital and legal literacy. Interviews with MSME owners in Sukoharjo revealed that most business owners are reluctant to process the OSS-RBA themselves due to the complexity of legal terms and digital technicalities and prefer to entrust the process to a notary through a power of attorney.¹⁷ This emphasizes the role of notaries as a bridge between business actors and the modern licensing system. As stated by Notary Agus, "OSS is not the public authority of notaries, but rather the public grants power of attorney because they feel safer having everything handled by someone who understands the law." This statement demonstrates that notaries carry out a representative role based on civil power of attorney, not the public authority of OSS-RBA.

Notaries then act as a bridge between the legal and technological worlds. Through civil power of attorney granted by business actors, notaries are often appointed to operate OSS-RBA accounts on behalf of their clients. It is important to emphasize that the notary's authority here is not the public authority of the OSS, but rather acts under the legal authority of a private party. In this role, notaries help expedite the business registration process while ensuring that the procedures remain legally valid.¹⁸

4) Accountability, Audit Trail, and Dispute Prevention

Every deed prepared by a notary is stored in the form of minutes of the deed, accompanied by a list of the parties' agreements, and supporting documents confirming identity and compliance verification. This document serves as an audit trail that can be traced in the event of discrepancies between the deed, the AHU approval results, and the OSS-RBA system. For example, differences in company address, shareholder structure, or signing authority. In interviews, it was emphasized that the minutes of the deed and KYC (Know Your Customer) documentation kept by the notary serve as primary references in the event of discrepancies between the AHU and OSS. When issues arise, for example, a discrepancy in address between the AHU and OSS, we can present the official documents that serve as the basis. This provides strong evidence for audits and prevents disputes.

5) Integrated Service Connectivity

The OSS-RBA system is connected to various other institutions, such as the Directorate General of Taxes (DGT) for NPWP matching, Customs and Excise for

¹⁷Interview with Mr. Gunadi, MSME Actor in Sukoharjo Regency, July 28, 2025

¹⁸IG Rai Widjaya, 2019, Legal Aspects of Business Licensing in Indonesia, Prenadamedia Group, Jakarta, p. 134.

customs access, and other technical ministries related to sectoral permits. Through this integration, notaries ensure that data in the legal documents they prepare, such as corporate NPWPs and management identities, aligns with tax profiles and data in the OSS-RBA system. This accuracy is crucial to ensure companies avoid obstacles when utilizing fiscal facilities, fulfilling customs obligations, or accessing cross-ministerial services, all of which are based on the NIB, a single identity number for business actors.¹⁹

6) Post-NIB Compliance Risk Mitigation

The role of a notary public does not end after the issuance of the NIB. In fact, a notary public can function as a compliance counselor, reminding business actors of post-licensing obligations. This includes fulfilling commitments regarding operational permits, standard certificates, as well as reporting changes to articles of association and other corporate actions that must be reported back to the OSS-RBA. According to interviews, many business actors neglect to update deeds or report data changes to the OSS-RBA after the NIB is issued. Notaries act as reminders and legal advisors to ensure that business actors are not only satisfied with the NIB but also fulfill their post-NIB commitments. Otherwise, the permit can be suspended. In other words, the notary public's role extends to the realm of compliance counselor, ensuring business actors comply with legal regulations throughout their company's lifecycle. Thus, notaries act not only as initial facilitators for business entity establishment but also as strategic partners in maintaining the continuity of legal compliance for businesses in the era of digital licensing.²⁰

The role of notaries in supporting the implementation of OSS-RBA in Sukoharjo Regency cannot be separated from the authority they possess as public officials. Notaries are authorized by law to create authentic deeds, including deeds of establishment of legal entities, which are a basic requirement for entrepreneurs to obtain a Business Identification Number (NIB). This authority is not only administrative but also has legal implications that determine the legality of a business entity's existence and operation. Therefore, to ensure the notary's role in OSS-RBA is properly positioned, a theoretical foundation is needed that can explain the limits, basis, and legitimacy of the authority of public officials.

3.2. Obstacles and Solutions in the Digitalization Process of Risk-Based Licensing Through OSS-RBA

The implementation of the OSS-RBA (Regional Business Entity Registration System) in Sukoharjo Regency, as part of the national agenda, faces various

¹⁹Dyah Ochtorina Susanti, 2021, Implementation of OSS-RBA from the Perspective of State Administrative Law, *Jurnal Rechtsvinding*, Vol. 10 No. 2, p. 235

²⁰Ahmad M. Ramli, 2022, Digital Transformation of Business Licensing: OSS-RBA as an Economic Legal Instrument, *Journal of Law and Development*, Vol. 52 No. 1, p. 77.

technical, administrative, and sociological obstacles. Technical obstacles stem from weak system infrastructure, which frequently experiences errors and hinders permit issuance. In terms of literacy, many MSMEs struggle to understand legal and digital procedures, thus relying on third parties or notaries. Problems also arise from data mismatches between deeds, AHU (Authorized Business Entity Registration), DJP (Directorate General of Taxes), Dukcapil (Civil Registration Agency), and OSS (Regional Business Entity Registration), which hinders validation, as well as the disharmony of regional regulations with central regulations. Socio-cultural obstacles are evident in the perception that permits are merely a formality, resulting in frequent neglect of post-NIB obligations. Proposed solutions include strengthening infrastructure, legal and digital literacy training programs, inter-agency system integration, harmonization of regional regulations, and ongoing legal education involving notaries as compliance facilitators. With these steps, the implementation of the OSS-RBA is expected to be more effective and able to create legal certainty and a conducive investment climate. Through the lens of Gustav Radbruch's theory of legal certainty, the role of notaries in the implementation of the OSS (Company-Based Licensing System) in Sukoharjo Regency is a crucial element in maintaining the validity of positive law, bridging legal facts on the ground, clarifying legal information, and stabilizing legal practice amidst regulatory changes. Therefore, the role of notaries is not merely administrative, but also contains strategic legal significance in realizing legal certainty for business actors in the region. From the overall discussion, it can be understood that the implementation of the OSS-RBA in Sukoharjo Regency reflects the dynamic relationship between the development of information technology and the need for legal certainty in the business licensing system. Obstacles encountered at the normative and technical levels show that digital transformation in licensing does not immediately bring effectiveness, but instead opens up space for the emergence of legal uncertainty if not anticipated with a clear and consistent regulatory framework. The role of notaries occupies a strategic position. Notaries not only function as authentic deed makers as a requirement for establishing a business entity, but also as guardians of the accuracy and legality of data entered into the OSS-RBA system.

4. Conclusion

The role of notaries in the OSS-RBA is to guarantee the validity of legal documents that form the basis for establishing a business entity and to help MSMEs understand and prepare documents to comply with digital procedures. Obstacles to the OSS-RBA include technical constraints such as infrastructure and digital literacy, as well as normative constraints such as overlapping regulations and rapid policy changes. Needed solutions include inter-agency coordination, consistent regulations, mentoring business actors, and the role of notaries in maintaining data validity. In relation to Gustav Radbruch's theory of legal certainty, the OSS-RBA must be able to provide clear, consistent, and effectively

enforceable laws to provide protection and a sense of security for business actors.

5. References

Journals:

- Abdul Jalal, Suwitno, Sri Endah Wahyuningsih, Keterlibatan Pejabat Notaris Terhadap Perbuatan Melawan Hukum Dan Turut Serta Melakukan Tindak Kejahatan Dalam Pemalsuan Dokumen, *Jurnal Akta*, Volume 5 Nomor 1 Maret 2018.
- Ahmad M. Ramli, 2022, Transformasi Digital Perizinan Berusaha: OSS-RBA sebagai Instrumen Hukum Ekonomi, *Jurnal Hukum dan Pembangunan*, Vol. 52 No. 1.
- Daniar Ramadhan dan Ngadino, 2019, Kewenangan Notaris Dalam Pembuatan Akta Yang Berhubungan Dengan Pertanahan, *Jurnal Notarius*, Volume 12 Nomor 2.
- Dyah Ochtorina Susanti, 2021, Penerapan OSS-RBA dalam Perspektif Hukum Administrasi Negara, *Jurnal Rechtsvinding*, Vol. 10 No. 2.
- Fathoni dan S. Tisnanta, 2018, Konstruksi Makna Izin Sebagai Instrumen Pengendalian Versus Kebijakan Kemudahan Investasi di Provinsi Lampung, *Jurnal Hukum Peratun*, Vol. 1, No. 1.
- Haura Atthahara, 2018, Inovasi Pelayanan Publik Berbasis E-Government : Studi Kasus Aplikasi Ogan Lopian Dinas, *Jurnal Politikom Indonesiana*, volume 3 nomor 1.
- Imam Muazansyah, 2020, 'Application Of Online Single Submission (OSS) Innovation In The Integrated Investment And Service Of Bulungan District', *Jurnal Ilmiah Administrasi Publik*, Vol. 18 No. 1.
- Imam Sucahyo, Husni Mubaroq, Robbiyatul Adawiyah. Implementasi Program Online Single Submission (OSS) Dalam Pelayanan Perizinan Usaha Mikro Pada Dinas Penanaman Modal Dan Pelayanan Terpadu Satu Pintu Di Kabupaten Probolinggo Di Era New Normal, *Jurnal Ilmiah Politik, Kebijakan, & Sosial (Publicio)*, Vol. 4, No. 2, Juli 2022.
- Nawaaf Abdullah, Munsyarif Abdul Chalim, 2017, Kedudukan Dan Kewenangan Notaris Dalam Membuat Akta Otentik, *Jurnal Akta*, Vol. 4 No. 4.
- Ndaru Satrio, Analisis Yuridis Terhadap Tindak Pidana Memberikan Keterangan Palsu Dalam Akta Otentik Sebagaimana Dimaksud Dalam Pasal 266 Ayat (1), *Jurnal LEX Certa*, Volume 1 Nomor 1 2016.

Seto Sanjoyo, 2020, Perizinan Berusaha Melalui Online Single Submission Sebagai Ketaatan Hukum Dalam Rangka Meningkatkan Investasi, *Borneo Law Review*, volume 4 nomor 1.

Slamet Mulyono, 2023. Pemutakhiran Hukum Perizinan Berusaha yang Terstruktur dari Sudut Pandang Pemerintah Provinsi Daerah Khusus Ibukota Jakarta, *JIHHP: Jurnal Ilmu Hukum Humaniora dan Politik*, Vol. 3, No. 2.

Yunandi Permana, 2023, Implementasi Dan Kendala Dalam Proses Perizinan Berusaha Terintegrasi Secara Elektronik Berbasis Risiko, *Jurnal SELISIK*, Volume 9, Nomor 2.

Books:

Adrian Sutedi, (2010), *Hukum Perizinan: Dalam Sektor Pelayanan Publik*, Sinar Grafika, Jakarta.

Chita Herdiyanti. (2017), *Politik Hukum Reforma Agraria dalam Sistem Hukum Pertanahan Nasional*, UII Press, Yogyakarta.

Zainal Asikin. (2018), *Pokok-Pokok Hukum Dagang Indonesia*, Rajawali Pers, Jakarta.

R.A. Chita Herdiyanti, (2017), *Politik Hukum Reforma Agraria dalam Sistem Hukum Pertanahan Nasional*, UII Press, Yogyakarta.

I.G. Rai Widjaya, (2019), *Aspek Hukum Perizinan Berusaha di Indonesia*, Prenada media Group, Jakarta.

Regulation:

The 1945 Constitution of the Republic of Indonesia

Civil Code

Law Number 2 of 2014 concerning amendments to Law Number 30 of 2004 concerning the Position of Notary.

Law Number 6 of 2023 concerning the Stipulation of Government Regulation in Lieu of Law on Job Creation.

Government Regulation Number 6 of 2021 concerning the Implementation of Business Licensing in Regions.

Government Regulation (PP) Number 28 of 2025 concerning the Implementation of Risk-Based Business Licensing

Sukoharjo Regency Regional Regulation Number 10 of 2022 concerning the
Implementation of Business Licensing.