

**LEGALITAS KARTU MULTI TRIP (KMT) MILIK PT KERETA
COMMUTER INDONESIA SEBAGAI ALAT PEMBAYARAN DALAM
TRANSAKSI PERJALANAN KERETA REL LISTRIK (KRL)
COMMUTER LINE BERDASARKAN PERATURAN BANK INDONESIA
NOMOR 20/6/PBI/2018 TENTANG UANG ELEKTRONIK**

Oleh
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INTISARI

Pada 1 Juli 2013, PT KCI secara resmi menerapkan sistem *E-Ticketing* yaitu KMT dengan sistem saldo mengendap. Dengan berkembangnya uang elektronik di Indonesia dan guna mengendalikan kegiatan uang elektronik oleh para penerbit, Bank Indonesia mengatur ketentuan tentang Uang Elektronik Nomor 20/6/PBI/2018 (PBI). Berdasarkan PBI, PT KCI belum memiliki izin uang elektronik sehingga suatu waktu Bank Indonesia dapat melakukan pemeriksaan kepada PT KCI atas KMT, dan dapat berdampak pada uang konsumen yang tercatat pada uang elektronik tidak dapat digunakan, sehingga tidak terpenuhinya hak konsumen berdasarkan undang-undang perlindungan konsumen.

Ditinjau dari sumber perolehan data penelitiannya, maka jenis penelitian ini adalah penelitian hukum normatif-empiris. Dalam penelitian ini ketentuan hukum normatif adalah Peraturan Bank Indonesia No 20/6/PBI/2018 tentang Uang Elektronik dan Undang-Undang No 8 Tahun 1999 tentang Perlindungan Konsumen, sedangkan empirisnya adalah melalui wawancara kepada narasumber dari PT Kereta Commuter Indonesia dan Bank Indonesia.

Sehingga diperoleh hasil penelitian bahwa sehubungan dengan KMT milik PT KCI belum memiliki izin uang elektronik, saat ini PT KCI dalam proses pengurusan izin uang elektronik kepada Bank Indonesia. Namun, dengan mempertimbangkan pelayanan terhadap penumpang, adanya dukungan dari Menteri Perhubungan atas KMT yang digunakan PT KCI, surat dari Bank Indonesia kepada Badan Pengelola Transportasi Jabodetabek (BPTJ) perihal tindak lanjut penetapan standar pembayaran transportasi nasional, dan adanya surat pernyataan dan jaminan dari Direksi PT KCI atas penggunaan KMT, secara legal KMT masih dapat digunakan sebagai uang elektronik.

Kata Kunci:

Izin Uang Elektronik, Perlindungan Konsumen, Kartu Multi Trip

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**THE LEGALITY OF MULTI-TRIP CARDS (KMT) OWNED BY PT
KERETA COMMUTER INDONESIA AS PAYMENT TOOL IN
ELEKTRONIC MULTIPLE UNIT (EMU) COMMUTER LINE BASED ON
BANK INDONESIA REGULATION NUMBER 20/6/PBI/2018
CONCERNING ELECTRONIC MONEY**

By
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ABSTRACT

On July 1, 2013, officially PT Kereta Commuter Indonesia (KCI) implemented the E-Ticketing system with the name of the card namely Multi Trip Card (KMT). As for the payment procedures that are applied namely the settling balance system. Along with the development of electronic money in Indonesia, Bank Indonesia as a regulator has a function to control the circulation of electronic money managed by electronic money issuers. Therefore, Bank Indonesia issued Bank Indonesia Regulation (PBI) Number 20/6/PBI/2018 concerning Electronic Money. Referring to Bank Indonesia Regulation, PT KCI does not yet have an electronic money permit which allows Bank Indonesia as a regulator to follow up on the findings of a license that PT KCI does not yet have on KMT so that this allows the impact arising from consumer money recorded on electronic money to be unusable.

Furthermore, this causes non-fulfillment of consumer rights based on consumer protection laws. Based on the source of research data obtained, this type of research is normative-empirical legal research. In this research, normative legal provisions are found in Bank Indonesia Regulation No 20/6/PBI/2018 concerning Electronic Money and Law No. 8 of 1999 concerning Consumer Protection, while for empirical research is through interviews with resource persons from PT Kereta Commuter Indonesia. So the results obtained during the research process that PT KCI does not yet have an electronic money permit for KMT.

The results showed that the Multi-Trip Card (KMT) owned by PT KCI did not yet have an electronic money permit even though the process of obtaining an electronic money permit to Bank Indonesia was under management. So the process have to consider the service to passengers in the use of KMT while still being supported by the Minister of Transportation, by continuing to follow a valid procedural form through Bank Indonesia Letter addressed to the Jabodetabek Transportation Management Agency (BPTJ) in connection with the follow-up to the determination of national transportation payment standards and the existence of statement letter and guarantee from the Directors of PT KCI for the use of KMT. Based on the legal side, KMT still be used as electronic money.

Keywords: *Electronic Money, Consumer Protection, Multi-Trip Cards*

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