

**THE EFFECTIVENESS OF MAYORAL REGULATION NUMBER 22 OF
2023 CONCERNING ELECTRONIC TICKETS (E-TICKETS) AT
BUNGURASIH TERMINAL FROM A MASHLAHAH PERSPECTIVE
(A Study at The Class II Land Transportation Management
Center of East Java)**

THESIS

BY:

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SIN. 220202110099



**DEPARTMENT OF SHARIA ECONOMIC LAW
FACULTY OF SHARIA
MAULANA MALIK IBRAHIM STATE ISLAMIC UNIVERSITY
MALANG
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MALANG
2026**

DECLARATION OF THESIS AUTHENTICITY

In the name of Allah,

With full awareness and a sense of responsibility for the development of knowledge, the author hereby declares that the thesis entitled:

THE EFFECTIVENESS OF MAYORAL REGULATION NUMBER 22 OF 2023 CONCERNING ELECTRONIC TICKETS (E-TICKETS) AT BUNGURASIH TERMINAL FROM A MASHLAHAH PERSPECTIVE (A Study at The Class II Land Transportation Management Center of East Java)

is truly an original work written independently in accordance with the principles of scientific writing and can be accounted for. Should it later be proven that this thesis is a result of plagiarism, either in part or in whole, then this thesis as a requirement for obtaining a degree shall be declared null and void by law.

Malang, 10th of May 2026

Author



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APPROVAL PAGE

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THE EFFECTIVENESS OF MAYORAL REGULATION NUMBER 22 OF 2023 CONCERNING ELECTRONIC TICKETS (E-TICKETS) AT BUNGURASIH TERMINAL FROM A MASHLAHAH PERSPECTIVE (A Study at The Class II Land Transportation Management Center of East Java)

The thesis advisor hereby declares that the thesis has fulfilled the scientific requirements to be submitted and examined by the Board of Examiners.

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








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No.	Date	Consultations Topics	Signature
1.	October 9, 2025	Revising the research background	
2.	October 15, 2025	Revising the title	
3.	October 29, 2025	Revising the literature review and theoretical framework	
4.	November 13, 2025	Approving the proposal	
5.	January 27, 2026	Discussing the post-proposal seminar revision	
6.	March 10, 2026	Discussing the research background	
7.	April 13, 2026	Discussing the theoretical framework	
8.	April 28, 2026	Discussing the results of research questions 1 and 2	
9.	May 6, 2026	Discussing and reviewing the full thesis draft	
10.	May 18, 2026	Approval of the thesis draft.	

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MOTTO

وَلَوْلَا إِذْ دَخَلْتَ جَنَّتَكَ قُلْتَ مَا شَاءَ اللَّهُ لَا قُوَّةَ إِلَّا بِاللَّهِ ۗ إِنَّ تَرِنَ أَنَا أَقَلَّ مِنْكَ مَالًا وَوَلَدًا

“Don't give up, because miracles often happen just when you're about to lose hope”

(Q.S. Al-Kahfi: 39)

“To the nights that turned into mornings, and the drafts that finally turned into a degree.”

“It always seems impossible until it's done.”

(Nelson Mandela)

PREFACE

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Alhamdulillah wa syukurillah, All praise be to Allah SWT, the Most Gracious and the Most Merciful, for His blessings, guidance, and mercy that have enabled the completion of this thesis entitled:

THE EFFECTIVENESS OF MAYORAL REGULATION NUMBER 22 OF 2023 CONCERNING ELECTRONIC TICKETS (E-TICKETS) AT BUNGURASIH TERMINAL FROM A MASHLAHAH PERSPECTIVE (A Study at The Class II Land Transportation Management Center of East Java)

properly and on time. May peace and blessings be upon the great Prophet Muhammad SAW, who has guided human kind from the darkness to the day after by *ad-dīn al-Islām wal-īmān*.

This thesis has been prepared to fulfill the final requirement for students to obtain a bachelor of law degree in the Department of Sharia Economic Law, Faculty of Sharia, Maulana Malik Ibrahim State Islamic University of Malang. The successful completion of this thesis would not have been possible without the guidance, direction, assistance, and encouragement of many parties. Therefore, on this occasion, the author would like to express sincere gratitude to:

1. Prof. Dr. Hj. Ilfi Nur Diana, M. Si., as the Rector of Maulana Malik Ibrahim State Islamic University of Malang
2. Prof. Dr. Hj. Umi Sumbulah, M. Ag., as the Dean of the Faculty of Sharia
3. Dwi Hidayatul Firdaus, M. SI., as the Head of the Department of Sharia Economic Law

4. Dr. Su'ud Fuadi, S. HI., M.EI., as the author's academic advisor, for the continuous advice and encouragement provided during the author's years of study
5. Iffaty Nasyiah, M. H., as the author's thesis advisor, for the valuable guidance and patience in assisting the completion of this thesis
6. All lecturers of the Faculty of Sharia for their dedication and knowledge, which have greatly contributed to author's academic and personal growth
7. The author would like to express the deepest gratitude to the management of Purabaya Terminal (Bungurasih), especially to Mr. Verie Sugiharto, S.E., as the Head of Purabaya Terminal, for his permission, guidance, and cooperation throughout the data collection process. His support and the openness of information provided were greatly meaningful to the smooth running of this research. The author also wishes to extend the sincerest thanks to all staff and officers of Purabaya Terminal, for their warmth, openness, and willingness to assist during the field research process. Their welcoming attitude and readiness to provide the information needed greatly contributed to the smooth and successful completion of the data collection in this study.
8. The most sincere gratitude is dedicated to the author's beloved family, especially to Mama and Bapak. You are the primary reason behind every drop of sweat and the unwavering spirit the author possesses to complete this academic journey promptly. Your endless prayers and love, which serve as the warmest home, are the driving forces that push the author to keep moving forward without hesitation. To the author's siblings, Samudra, Nymas, and

Fatih thank you for being loyal supporters who always provide joy and faith in every dream the author pursues. Your presence is not just as companions, but as the greatest motivation that makes the author strive to finish this thesis as a small tribute to the unconditional love you all provide. Thank you for being a family where the author can always feel safe, loved, and never alone in this struggle.

9. All of the author's best friends, namely Ita, Davina, Rifa, Haikal, Iqbal, Farhan, Dina, Kakbeng, Humay, and Tasya, for their support, encouragement, and assistance throughout the process of completing this research. Their togetherness, motivation, and care, both during difficult and pleasant times, have become a source of encouragement for the author to successfully complete this research.
10. The friends of Poseidone HES 2022 at UIN Malang, thank you for this wonderful journey. Thank you for being not only friends but also like family, and for providing many valuable experiences. May we meet again on another occasion and become successful people in both this world and the hereafter.
11. As the most cherished closing of these pages, the author wishes to offer the deepest gratitude not to anyone else, but to oneself. Thank you for being fully present in every moment of this struggle. Thank you for all the nights spent in silence, when your eyes grew heavy yet your resolve never wavered. Thank you for the tears that fell quietly not as signs of weakness, but as proof that you cared enough to keep going. Thank you for not giving up when exhaustion felt more real than anything else. Thank you for choosing to rise on the mornings

you could have surrendered to but didn't. Thank you for holding on to belief, even in the moments when everything felt dark and there was no one left to convince you but yourself. This journey was not easy, and you know that more than anyone. There were days when doubt spoke louder than courage. There were moments when you wondered whether everything would turn out alright. But here you are arrived, finished, having proven to yourself that you are capable. This entire process has been the greatest mirror you have ever stood before. In it, you saw yourself not merely as someone who was learning, but as someone who was growing in patience, in responsibility, in the courage to never stop. Let this be a reminder you carry for the rest of your life: that you once stood at your heaviest point, and you chose to remain standing. That is not a small thing. That is one of the greatest things you have ever done for yourself.

With the completion of this thesis, Author hopes the insights gained during Author's study at Maulana Malik Ibrahim State Islamic University Malang will serve a meaningful purpose both now and in the future. While this work represents a dedicated effort, the author fully aware that this thesis is full of limitations and

remains welcome to constructive feedback and suggestions to refine future scholarly improvement.

Malang, 10th May 2026

Author

Galuh Kusuma Dewi

NIM 220202110099

TRANSLITERATION GUIDELINES

In the writing of scientific papers, the use of foreign terms is often inevitable. According to the General Guidelines for Indonesian Spelling, foreign words are generally written in italics. For Arabic terms, there are specific transliteration guidelines that apply internationally. The following table presents these transliteration guidelines as a reference for academic writing. The Arabic–Indonesian transliteration system used by the Faculty of Sharia at Maulana Malik Ibrahim State Islamic University of Malang follows the Library of Congress (LC) model of the United States, as outlined below:

Arab	Indonesia	Arab	Indonesia
ا	`	ط	ṭ
ب	b	ظ	ẓ
ت	t	ع	‘
ث	th	غ	gh
ج	j	ف	f
ح	ḥ	ق	q
خ	kh	ك	k
د	d	ل	l
ذ	dh	م	m
ر	r	ن	n
ز	z	و	w
س	s	هـ	h
ش	sh	أ/ء	’
ص	ṣ	ي	y
ض	ḍ		

To indicate a long vowel sound (*madd*), a horizontal line is placed above the letter, as in ā, ī, and ū (أ, ي, و). Arabic diphthongs are transliterated by combining the letters “ay” and “aw,” as in *layyinah* and *lawwāmah*. Words ending in *tā’ marbūṭah* that

function as adjectives or *muḏāf ilayh* are transliterated with “ah,” while those functioning as *muḏāf* are transliterated with “at.”

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ABSTRACT

Galuh Kusuma Dewi, 220202110099, 2026, *The Effectiveness of Mayoral Regulation Number 22 of 2023 Concerning Electronic Tickets (E-Tickets) at Bungurasih Terminal from a Mashlahah Perspective (A Study at the Class II Land Transportation Management Center of East Java)*, Undergraduate Thesis, Department of Sharia Economic Law, Faculty of Sharia, Maulana Malik Ibrahim State Islamic University of Malang, Advisor: Iffaty Nasyi'ah, M.H.

Keywords: Electronic Ticket, Legal Effectiveness, Mashlahah

The development of digital technology drives the transformation of public transportation services, one of which is through the implementation of the electronic ticket (e-ticket) system at Bungurasih Terminal, as regulated in Surabaya Mayoral Regulation Number 22 of 2023. However, in practice, economy-class buses still operate conventionally, ticket scalping practices have not been fully resolved, and public socialization remains suboptimal. This study aims to assess the effectiveness of the implementation of Mayoral Regulation Number 22 of 2023 concerning e-tickets at Bungurasih Terminal in supporting the realization of the Smart City concept in Surabaya, as well as to analyze its implementation from a *mashlahah* perspective for public transportation users. This study employs an empirical juridical research method with a socio-legal approach. Primary data were obtained through interviews with the management of the Class II Land Transportation Management Center of East Java, Bungurasih Terminal officers, and public transportation users, while secondary data were gathered from various literature, scientific journals, relevant laws and regulations, as well as official documents related to the implementation of e-tickets at Bungurasih Terminal.

The results of the study indicate that the implementation of Mayoral Regulation Number 22 of 2023 at Bungurasih Terminal has not been fully effective. Based on Soerjono Soekanto's theory of legal effectiveness, there are obstacles regarding the factors of law enforcement, facilities and infrastructure, society, and legal culture, wherein the e-ticket system has only run effectively for Suroboyo Bus, Trans Jatim, and Wira-Wiri services, while economy-class buses remain entirely conventional. From a *mashlahah* perspective, the e-ticket policy at Bungurasih Terminal is categorized as *mashlahah hajiyah* based on the *raf' al-haraj* (elimination of hardship) parameter. The absence of e-tickets has been proven to cause real difficulties for the public, in the form of ticket scalping practices that force passengers to pay above the official price, lack of price transparency, and disorderly passenger management resulting in discomfort. Nevertheless, this *hajiyah* benefit has not been comprehensively achieved as long as the scope of e-ticket implementation remains limited to only certain services at Bungurasih Terminal.

ABSTRAK

Galuh Kusuma Dewi, 220202110099, 2026, *The Effectiveness of Mayoral Regulation Number 22 of 2023 Concerning Electronic Tickets (E-Tickets) at Bungurasih Terminal from a Mashlahah Perspective (A Study at the Class II Land Transportation Management Center of East Java)*, Skripsi, Program Studi Hukum Ekonomi Syariah, Fakultas Syariah, Universitas Islam Negeri Maulana Malik Ibrahim Malang, Pembimbing: Iffaty Nasyiah, M.H.

Kata Kunci: *Electronic-Ticket, Efektivitas Hukum, Mashlahah.*

Perkembangan teknologi digital mendorong transformasi layanan transportasi publik, salah satunya melalui penerapan sistem electronic-ticket (e-ticket) di Terminal Bungurasih yang diatur dalam Peraturan Wali Kota Surabaya Nomor 22 Tahun 2023. Namun dalam praktiknya, bus kelas ekonomi masih beroperasi secara konvensional, praktik percaloan belum sepenuhnya teratasi, dan sosialisasi kepada masyarakat belum berjalan optimal. Penelitian ini bertujuan untuk menilai efektivitas pelaksanaan Perwali Nomor 22 Tahun 2023 tentang e-ticket di Terminal Bungurasih dalam mendukung terwujudnya konsep Smart City di Kota Surabaya serta menganalisis pelaksanaannya berdasarkan perspektif mashlahah bagi masyarakat pengguna transportasi publik. Jenis penelitian yang digunakan adalah yuridis empiris dengan pendekatan yuridis sosiologis. Data primer diperoleh melalui wawancara dengan pihak pengelola Balai Pengelola Transportasi Darat Kelas II Jawa Timur, petugas Terminal Bungurasih, dan masyarakat pengguna transportasi publik, sedangkan data sekunder diperoleh dari berbagai literatur, jurnal ilmiah, peraturan perundang-undangan yang relevan, serta dokumen resmi terkait pelaksanaan e-ticket di Terminal Bungurasih.

Hasil penelitian menunjukkan bahwa penerapan Perwali Nomor 22 Tahun 2023 di Terminal Bungurasih belum berjalan efektif secara menyeluruh. Berdasarkan teori efektivitas hukum Soerjono Soekanto, terdapat hambatan pada faktor penegak hukum, sarana dan prasarana, masyarakat, serta budaya hukum, di mana e-ticket baru berjalan efektif pada layanan Suroboyo Bus, Trans Jatim, dan Wira-Wiri, sementara bus kelas ekonomi masih sepenuhnya konvensional. Ditinjau dari perspektif mashlahah, kebijakan e-ticket di Terminal Bungurasih dikategorikan sebagai mashlahah hajiyyah berdasarkan parameter raf' al-haraj (penghilang kesulitan). Ketiadaan *e-ticket* terbukti menimbulkan kesulitan nyata bagi masyarakat, berupa praktik percaloan yang meminta penumpang membayar di atas harga resmi, ketidaktransparanan harga dan ketidaktertiban pengelolaan penumpang yang mengakibatkan ketidaknyamanan. Namun demikian kemashlahatan hajiyyah tersebut belum tercapai secara menyeluruh selama cakupan penerapan e-ticket masih terbatas pada sebagian layanan di Terminal Bungurasih.

المخلص

جالوه كوسوما ديوي، ٢٠٢٦، ٢٢٠٢٠٢١١٠٠٩٩، *فعالية لائحة رئيس البلدية رقم ٢٢ لسنة ٢٠٢٣ بشأن التذاكر الإلكترونية (E-Ticket) في محطة بونجوراسيه من منظور المصلحة (دراسة في مركز إدارة النقل البري من الفئة الثانية بجاوة الشرقية)*، البحث الجامعي، قسم قانون الاقتصاد الشرعي، كلية الشريعة، جامعة مولانا مالك إبراهيم الإسلامية الحكومية مالانج. المشرفة: عفتي ناشنة، الماجستير.

الكلمات المفتاحية: التذاكر الإلكترونية، الفعالية القانونية، المصلحة

يدفع تطور التكنولوجيا الرقمية إلى تحويل خدمات النقل العام، وأحدها من خلال تطبيق نظام التذاكر الإلكترونية (*e-ticket*) في محطة بونجوراسيه والذي تم تنظيمه بموجب لائحة رئيس بلدية سورابايا رقم ٢٢ لسنة ٢٠٢٣. ولكن في الممارسة العملية، لا تزال حافلات الدرجة الاقتصادية تعمل بشكل تقليدي، ولم يتم التغلب على ممارسات السمسرة بالكامل، ولم يتم توعية المجتمع على النحو الأمثل. يهدف هذا البحث إلى تقييم فعالية تنفيذ لائحة رئيس البلدية رقم ٢٢ لسنة ٢٠٢٣ بشأن التذاكر الإلكترونية في محطة بونجوراسيه في دعم تحقيق مفهوم المدينة الذكية (*Smart City*) في مدينة سورابايا، وكذلك تحليل تنفيذها بناءً على منظور المصلحة للمجتمع المستخدم للنقل العام. نوع البحث المستخدم هو البحث القانوني التجريبي مع نهج قانوني اجتماعي. تم الحصول على البيانات الأولية من خلال المقابلات مع إدارة مركز إدارة النقل البري من الفئة الثانية بجاوة الشرقية، وموظفي محطة بونجوراسيه، والمجتمع المستخدم للنقل العام، بينما تم الحصول على البيانات الثانوية من مختلف المراجع، والمجلات العلمية، والقوانين واللوائح ذات الصلة، وكذلك الوثائق الرسمية المتعلقة بتنفيذ التذاكر الإلكترونية في محطة بونجوراسيه.

أظهرت نتائج البحث أن تطبيق لائحة رئيس البلدية رقم ٢٢ لسنة ٢٠٢٣ في محطة بونجوراسيه لم يعمل بفعالية بشكل كامل. وبناءً على نظرية الفعالية القانونية لسورجونو سوكانتو (*Soerjono Soekanto*)، توجد عقبات في عوامل إنفاذ القانون، والمرافق والبنية التحتية، والمجتمع، والثقافة القانونية، حيث لم يتم تفعيل التذاكر الإلكترونية بنجاح إلا في خدمات حافلات سورابايا (*Suroboyo Bus*)، وترانس جاتيم (*Trans Jatim*)، وويرا-ويري (*Wira-Wiri*)، في حين لا تزال حافلات الدرجة الاقتصادية تعتمد النظام التقليدي بالكامل. ومن منظور المصلحة، تُصنف سياسة التذاكر الإلكترونية في محطة بونجوراسيه على أنها مصلحة حاجية بناءً على معيار رفع الحرج. وقد ثبت أن غياب التذاكر الإلكترونية يسبب صعوبات حقيقية للمجتمع، تتمثل في ممارسات السمسرة التي تفرض على الركاب الدفع أعلى من السعر الرسمي، وانعدام الشفافية في الأسعار، وعدم الانتظام في إدارة الركاب مما يؤدي إلى عدم الراحة. ومع ذلك، فإن هذه المصلحة الحاجية لم تتحقق بشكل كامل طالما أن نطاق تطبيق التذاكر الإلكترونية لا يزال مقتصرًا على بعض الخدمات في محطة بونجوراسيه.

CHAPTER I

INTRODUCTION

A. Research Background

The development of information and communication technology (ICT) drives changes in urban governance, particularly in the delivery of public services. The utilization of technology plays a crucial role in realizing a Smart City oriented towards efficiency, transparency, and the improvement of service quality for the public. However, the implementation of the Smart City concept depends not only on technological sophistication and the existence of regulations, but also on the extent to which these legal rules can be effectively implemented and accepted by society.¹

Surabaya is known as one of the pioneers of the Smart City in Indonesia, which won the Smart City Award in 2011, and is one of the cities that consistently develops the Smart City concept.² The Surabaya City Government normatively shows a strong commitment to digital transformation through the implementation of e-government, non-cash payment systems, and the development of smart mobility in the public transportation sector. One concrete form of this commitment is the issuance of Surabaya Mayoral Regulation

¹ Sri Yulianty Mozin, Susanti Abdullah, dan Nadia Sawali, "Pemanfaatan Teknologi Cerdas Untuk Pelayanan Publik: Study Tentang e-Government Dan Smart City Berbasis ICT Big Data Dan AI," *JPS: Journal of Publicness Studies* 2, no. 2 (2025): 117–30, <https://jurnal.fisip.untad.ac.id/index.php/jps/id/article/view/1948/596>.

² Devi Novita Sari, Dia Zulfia Rahmadani, dan Mohamad Yusuf Wardani, "Implementasi Kebijakan Pemerintah Kota Surabaya Dalam Mewujudkan Inovasi Smart City," *Journal of Governance Innovation* 2, no. 2 SE-Articles (11 September 2020): 112–30, <https://doi.org/10.36636/jogiv.v2i2.435>.

Number 22 of 2023 concerning Tariffs and Waste Contributions in the Use of Regional Public Service Agency (BLUD) Services of the Surabaya City Transportation Agency, specifically in Articles 14 and 15 which regulate the use of non-cash payment systems through QRIS, electronic money, electronic tickets (e-tickets), and other digital transactions. As well as regulating the use of the Surabaya City electronic ticket card or the GoBis application for purchasing prepaid tickets, passenger registration, or the GoBis application for purchasing prepaid tickets, passenger registration, and ticket scanning during the trip as proof of transaction on the transaction services.³

Juridically, Surabaya Mayoral Regulation Number 22 of 2023 is an implementing regulation established based on the regional autonomy authority of Surabaya City as stipulated in Law Number 23 of 2014 concerning Regional Government. The reGENCY/city government has the authority to regulate transportation affairs within its region, including setting tariffs and payment mechanisms for regional public transportation services, as long as it does not conflict with higher regulations. Surabaya City Regional Regulation Number 7 of 2006 concerning the Operation of Passenger Transport on the Road with Public Vehicles serves as the legal umbrella underlying the issuance of this Mayoral Regulation. Thus, Mayoral Regulation No. 22 of 2023 is positioned as an operational technical regulation which is an implementing regulation of the Regional Regulation.

³ Badan Layanan Umum Daerah (BLUD) Dinas Perhubungan Kota Surabaya, “Peraturan Wali Kota Surabaya Nomor 22 Tahun 2023 Pasal 14 dan 15 tentang Kontribusi Sampah dalam Penggunaan Layanan” (2023).

The non-cash payment-based e-ticket system has had a significant positive impact on the quality of public transportation services in various major cities in Indonesia. DKI Jakarta is an example of this. Since 2013, Transjakarta officially switched from a cash payment system to a prepaid card-based electronic ticket system issued by various banks, such as Flazz BCA, e-Money Mandiri, Brizzi BRI, Tap Cash BNI, and Jak Card Bank DKI. This system later evolved to accommodate payments through QRIS, making it more inclusive and easily accessible. Furthermore, Jakarta developed a cross-modal integrated e-ticket system through the PT JakLingko Indonesia platform, which was officially formed based on DKI Jakarta gubernatorial Regulation Number 63 of 2020. JakLingko integrates the payment systems, tariffs, and routes of all public transportation modes in Jakarta, including Transjakarta, Jakarta Mass Rapid Transit (MRT), Jakarta Light Rail Transit (LRT), and the Commuter Line (KRL).⁴ By using a single card, passengers can transfer between modes without having to make another transaction. Jakarta's success in integrating this cross-modal e-ticket serves as clear evidence that non-cash payment systems are capable of creating a more orderly, safe, and efficient public transportation.

⁴ Sabrina Handayani, Dessy Angga Afrianti, dan Mega Suryandari, "Implementasi kebijakan angkutan umum di DKI Jakarta," *Jurnal Teknologi Transportasi Dan Logistik* 2, no. 1 (2021): 19–28, <https://jurnal.poltradabali.ac.id/jttl/article/view/30/20>.

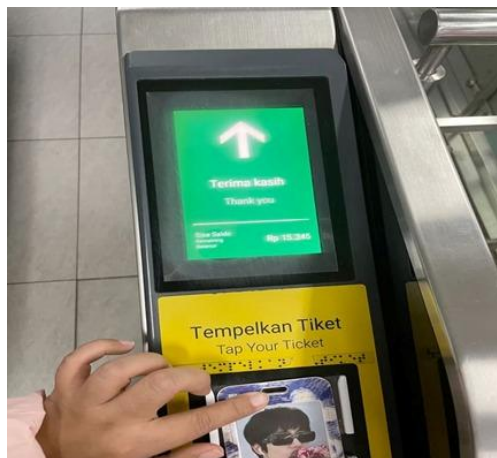


Figure 1. 1 The Use of Electronic Cards (E-Tickets) Through the Tap Card System

Meanwhile, field conditions in Surabaya City show that the implementation of this policy has not run as expected. At Bungurasih Terminal, which is the largest terminal in East Java, the conventional ticket system is still widely used, especially on economy class buses. Scalping practices, cash payments, and disorderly passenger arrangements are still found. This indicates that although the regulation exists, its implementation has not been fully effective in changing service patterns and the behavior of transportation users.⁵

The ineffectiveness of e-ticket implementation at Bungurasih Terminal can be seen from several aspects. In terms of facilities and infrastructure, not all terminal services are supported by adequate and optimally functioning e-ticketing facilities. In terms of enforcement, the non-cash payment provisions have not been accompanied by strict supervision and sanctions, so violations still occur. Meanwhile, from the public's perspective, readiness and

⁵ 4R1F T1454, "Terminal Bungurasih Memanas: Calo Tiket Dikeroyok Usai Diduga Tipu Penumpang," *Koran Digital Nusantara Abadi News*, 2025, <https://nusantaraabadi.com/2025/08/24/terminal-bungurasih-memanas-calo-tiket-dikeroyok-usai-diduga-tipu-penumpang/>.

understanding of the electronic ticket system are still limited. Some passengers prefer cash payments because they consider them easier, are not yet accustomed to digital technology, and still rely on scalper services which they find practical.

These conditions show a gap between the legal policies designed to support the Smart City and the social and cultural realities of the community.⁶ Conceptually, Surabaya Mayoral Regulation Number 22 of 2023 is in line with smart mobility, but its implementation has not been fully supported by public readiness and a culture of order in the use of public transportation. As a result, the law has not functioned optimally as a means of regulating and directing social activities, so the policy objectives have not been fully achieved.

From the perspective of *maslahah*, transportation policies should provide tangible benefits to the community,⁷ especially in ensuring the safety, comfort, and orderliness of services. A ticketing system that still leaves room for scalping, disorderly queues, and the potential for passenger overloading has the potential to harm transportation service users. Therefore, the implementation of e-tickets that has not run effectively can be viewed as not fully reflecting the value of *maslahah*, because the expected benefits of the policy have not been felt evenly by the public.

Several previous studies have examined the digitalization of tickets and transportation services, but outside of legal research, with a limited scope.

⁶ Ni Made Hintya Mahayani, "Evaluasi Implementasi Smart City Di Indonesia: Tantangan Teknologi Dan Keberlanjutan," *GOVERNANCE: Jurnal Ilmiah Kajian Politik Lokal dan Pembangunan* 10, no. 4 (2024), <https://doi.org/10.56015/gjikplp.v10i4.209>.

⁷ Rizqy Sadino, "Implementasi Permenhub pasal 7 nomor 83 Tahun 2021 tentang kriteria dan pelayanan Angkutan Umum: Studi di PO Nori Trans" (Universitas Islam Negeri Maulana Malik Ibrahim, 2025).

Risma Septiana et al. designed a web-based e-ticket system for the Joyoboyo-Menganti route, focusing on operational efficiency without discussing institutional regulations.⁸ Sari et al. evaluated digitalization on the Suroboyo Bus, including QRIS and the GoBis application, highlighting user convenience without exploring terminal regulations as a smart city node.⁹ Haikal Risal Fikri examined the effectiveness of the Suroboyo Bus in public mobility, touching on aspects of user satisfaction and accessibility, rather than the regulatory aspect of e-ticket digitalization at terminals.¹⁰ In contrast to these three studies, this research focuses on the effectiveness of the implementation of Surabaya Mayoral Regulation Number 22 of 2023 concerning electronic tickets (e-tickets) at Bungurasih Terminal, viewed from the perspective of *masalah*. This study emphasizes the extent to which the policy is able to realize public transportation governance that is efficient, transparent, and oriented towards the benefit of the community within the framework of Smart City development in Surabaya City.

Based on these conditions, this research focuses on the effectiveness of the implementation of Surabaya Mayoral Regulation Number 22 of 2023,

⁸ Risma Septiana Ari Susanti dan Anita Susanti, "Rancangan Digitalisasi Tiket Angkutan Umum (Lyn) Berbasis Website Berdasarkan Jarak Perjalanan (Studi Kasus: Trayek Joyoboyo-Menganti Surabaya)," *Jurnal Media Publikasi Terapan Transportasi*, 2024, 291–302, <https://doi.org/10.26740/mitrans.v2n3.p291-302>.

⁹ Erika Yunita Sari, Yusuf Hariyoko, dan Adi Soesiantoro, "ANALISIS PELAYANAN DIGITALISASI TRANSPORTASI PADA TRANSPORTASI PUBLIK 'SUROBOYO BUS' KOTA SURABAYA," *PRAJA observer: Jurnal Penelitian Administrasi Publik (e- ISSN: 2797-0469)* 4, no. 02 SE-ADMINISTRASI PUBLIK (1 Maret 2024): 103–11, <https://doi.org/10.2139/ssrn.5008271>.

¹⁰ Haikal Risal Fikri, "Suroboyo Bus as a Case Study in Public Transportation Efficacy at City of Surabaya, East Java Indonesia," *Suroboyo Bus as a Case Study in Public Transportation Efficacy at City of Surabaya, East Java Indonesia (November 03, 2024)*, 2024, <https://dx.doi.org/10.2139/ssrn.5008271>.

Articles 14 and 15, concerning electronic tickets (e-tickets) at Bungurasih Terminal. This study examines how the policy is technically implemented at Bungurasih Terminal, the obstacles faced in its implementation, and the extent to which the policy is able to realize masalah for public transportation users within the framework of Smart City development in Surabaya City.

B. Research Question

The research questions formulated in this study are as follows:

1. How effective is the implementation of Surabaya Mayoral Regulation Number 22 of 2023 concerning electronic tickets (e-tickets) at Bungurasih Terminal in supporting the realization of the Smart City concept in Surabaya City?
2. How is the implementation of electronic tickets (e-tickets) at Bungurasih Terminal based on the principle of masalah for public transportation users?

C. Research Objective

The objectives to be achieved in this study are as follows:

1. To assess the effectiveness of the implementation of Surabaya Mayoral Regulation Number 22 of 2023 concerning electronic tickets (e-tickets) at Bungurasih Terminal in supporting the Smart City concept in Surabaya City.
2. To examine the implementation of electronic tickets (e-tickets) at Bungurasih Terminal from the perspective of masalah for public transportation users.

D. Research Significance

The research significance of this study are:

1. Theoretical Significance
 - a. The findings of this research can serve as a reference for academics and other researchers in developing similar studies that discuss the relationship between transportation digitalization, policy effectiveness, and the values of public *maslahah*.
 - b. This research can enhance the understanding of the application of the *maslahah* concept in modern transportation policies.
 - c. This research can broaden the study of public policy regarding the implementation of the smart city concept in the transportation sector, specifically the application of electronic ticketing systems at terminals.
2. Practical Significance
 - a. This research is expected to serve as evaluation material and academic input for the management of Bungurasih Terminal under the Ministry of Transportation in improving the implementation of electronic ticket regulations at the terminal, making it more effective and aligned with the smart city concept.
 - b. This research is expected to provide an understanding to public transportation users regarding the importance of the electronic ticket system in creating safer, more comfortable, orderly, and transparent services.

- c. This research is expected to serve as a consideration for the local government regarding the importance of strengthening ticket digitalization at terminals as part of the Smart City program, in order to suppress scalping practices, reduce passenger overloading, and improve the orderliness of public transportation services.

E. Operational Definitions

1. Mayoral Regulation No. 22 of 2023

Surabaya Mayoral Regulation Number 22 of 2023 is the legal basis regulating the use of the Regional Public Service Agency (BLUD) of the Surabaya City Transportation Agency, including the implementation of digital payment systems and electronic tickets (e-tickets) in public transportation services. In Articles 14 and 15, this regulation emphasizes that payment for transportation services can be made non-cash through QRIS, electronic money, electronic ticket cards, and digital applications such as GoBis.

2. Smart City

Smart City is an urban management concept that utilizes information and communication technology (ICT) in an integrated manner to improve the quality of public services, operational efficiency, and public *maslahah*. In the context of transportation, specifically at Bungurasih Terminal in Surabaya, the Smart City is realized through the digitalization of the ticketing system (e-ticket), which aims to achieve efficient and transparent

transportation management that is integrated with other modes of transportation.

F. Systematics of Discussion

The systematic of discussion of this thesis is as follows:

1. Chapter I: Introduction

Chapter I of this research is the introduction. The introduction consists of several sections, namely the background of the study, research questions, research objectives, and research significance. The background of the study provides a general overview of the problems discussed in this research. There are two research questions formulated in this study. The research objectives correspond to the number of the research questions. Furthermore, the significance of this research is twofold, encompassing benefits for both the author and the readers.

2. Chapter II: Literature Review

Chapter II in this research is the Literature Review. The literature review contains a review and critical analysis of literature or sources relevant to the research topic. It will discuss the theoretical framework and previous studies.

3. Chapter III: Research Methods

Chapter III of this research is the research methodology. This methodology is divided into several sub-chapters, namely: research type, research approach, research location, data sources, data collection methods, and data processing methods. This research employs an empirical juridical

type. The research approach applied is a sociological juridical approach. The research data sources consist of primary data and secondary data. The data collection methods include interviews, observation, and documentation. The data processing methods are conducted through data checking (editing), classification (classifying), verification (verifying), data analysis (analyzing), and drawing conclusions (concluding).

4. Chapter IV: Result Findings and Discussion

Chapter IV of this research presents the research findings and discussion. This section will review and address the research questions formulated in Chapter I. The conclusion drawn from this research is regarding the Implementation of Surabaya Mayoral Regulation Number 22 of 2023, Articles 14 and 15, concerning Electronic Tickets (E-Tickets) at Bungurasih Terminal from the Perspective of Maslahah. Through the discussion in this chapter, the researcher attempts to explain how the implementation of the e-ticket system at Bungurasih Terminal is carried out by the Ministry of Transportation in Surabaya City, the obstacles faced in its implementation, and the extent to which the policy fulfills the values of public maslahah in realizing the Smart City concept in Surabaya City.

5. Chapter V: Conclusion

Chapter V of this study is the conclusion. This chapter serves as the final part of the research, containing the conclusions and recommendations. The conclusions present concise answers to the research questions outlined

in Chapter I. The recommendations are directed to relevant stakeholders as well as to future researchers who may choose related topics or references.

CHAPTER II

LITERATURE REVIEW

A. Previous Research

After conducting a literature review from various sources such as books, journals, the internet, as well as several studies and theses from various universities, the researcher found a number of studies or theses that share similarities or nearly identical substance, but differ in focus and analytical perspectives. Some of these studies include:

1. A study conducted by Devi and Febri Putri titled “The Implementation of Magelang City Regional Regulation Number 5 of 2018 concerning Regional Innovation in the Context of Realizing a Smart City in Magelang City (A Case Study of the Monggo Lapor Feature in the Magelang Cerdas Application)” discusses the effectiveness of regional regulations as the legal basis for implementing digital innovation in local government. The focus of the study lies in the implementation of digital technology-based public innovation policies that support the realization of a smart city. This research employs an empirical juridical method and shows that the success of an innovation heavily depends on regulatory support, socialization, and public participation. The difference between their study and this research lies in the focus of the object of study. Devi's research highlights government innovation in general, whereas this research focuses on the public transportation sector through the implementation of the e-ticket system at Bungurasih Terminal. Furthermore, this research also assesses the dimension

of social *masalah* as a benchmark for the success of digital transportation policies in the region.¹¹

2. A study conducted by Anita Ratnasari Rahmatullah titled “Integration Among Public Transportation in Semarang City” examines inter-agency coordination and the effectiveness of transportation policies in realizing intermodal integration in the region. The focus of this study is the synchronization between regulations and the readiness of implementing agencies in supporting the integration of public transportation. This research employs an empirical juridical method. The research findings indicate that the success of transportation policies heavily relies on cross-agency cooperation and the clarity of their implementing regulations. The difference between her study and this research is that Anita's research emphasizes the physical integration among transportation modes, whereas this research examines digital integration through the e-ticket policy regulated in Surabaya Mayoral Regulation Number 22 of 2023. Furthermore, this research also assesses the aspect of *masalah* as a measure of the success of digital-based transportation policies in improving public services at the city level.¹²
3. A study conducted by Nurul Fikri in 2025 titled “Economic Law Analysis of Public Transportation Policy in Medan City; An Al-Maslahah Perspective”

¹¹ Devi Febriliyanti Putri, “Implementasi Perda Kota Magelang Nomor 5 Tahun 2018 Tentang Inovasi Daerah Dalam Rangka Mewujudkan Smart City Di Kota Magelang (Studi Kasus Fitur Monggo Lapor Pada Aplikasi Magelang Cerdas)” (Universitas Muhammadiyah Magelang, 2023).

¹² Anita Ratnasari Rahmatullah, Diah Intan Kusumo Dewi, dan Chindy Dhia Tsabit Nurmasari, “Integrasi antar transportasi umum di Kota Semarang,” *Jurnal Pengembangan Kota* 10, no. 1 (2022): 36–46.

focuses on how public transportation policies are viewed within the framework of Islamic economic law. This research is motivated by the issue of poor service quality and the safety of public transportation in Medan City, which has caused public unrest. The method used is a normative-qualitative study with an Islamic economic law approach and the theory of *al-maslahah al-mursalah*. The research findings indicate that public transportation policies will possess the value of *maslahah* if they can guarantee safety, comfort, and affordability, thereby aligning with *maqāṣid al-syari'ah*, particularly in protecting life (*hifz al-nafs*) and property (*hifz al-māl*). This study emphasizes the importance of the local government's role in structuring transportation policies based on *maslahah*, rather than merely administrative considerations, to create a fairer, safer, and more sustainable public transportation system.¹³

4. A study conducted by Audrea Maria Margaretha and Alih Aji Nugroho in 2025 titled “Integrated Public Transportation: Optimizing the Implementation of Smart Mobility in DKI Jakarta” focuses on evaluating the application of the smart mobility concept as part of the smart city vision. This research utilizes a qualitative method to analyze the integration of public transportation services involving BRT, MRT, LRT, and KRL, supported by information and communication technology. The research findings indicate that Jakarta has successfully achieved the 'move freely'

¹³ Irfan Effendi Hasibuan dan Zulham Zulham, “Analisis Hukum Ekonomi Terhadap Kebijakan Angkutan Umum di Kota Medan; Perspektif Al-Maslahah,” *Al-Muamalat Jurnal Hukum dan Ekonomi Syariah* 10, no. 1 (2025): 1–14, <https://doi.org/10.32505/muamalat.v10i1.10659>.

indicator, meaning that accessibility and the ease of changing transportation modes are relatively good. However, there are still challenges regarding the 'less mobility' (a reduction in the number of mode transfers) and 'less travel time' (travel times that are still relatively long) indicators, which signify the need for improvements in the digital and physical integration systems. This research emphasizes that the comprehensive integration of transportation modes not only increases mobility efficiency but also strengthens the direction of inclusive and responsive smart city development. From the perspective of sustainable development and public *maslahah*, this study is significant as it demonstrates that a robust integration system can maintain comfort, reduce inequality in access, and create widespread benefits for the community.¹⁴

5. A study conducted by Ayuning Tyas Azis Putri in 2023 titled “Legal Protection for Public Transportation Passengers Experiencing Overload” focuses on the legal regulations governing the load of passengers and goods in public transportation, as well as the legal protection mechanisms for victims of overloading. The method used is a normative juridical approach, analyzing Government Regulation (PP) Number 74 of 2014, specifically Article 4 paragraph (2) and Article 10 paragraph (3). The research findings indicate that this regulation strictly prohibits the practice of overloading, and protection for passengers is provided through *Jasa Raharja* social insurance,

¹⁴ Audrea Maria Margaretha dan Alih Aji Nugroho, “Transportasi Publik Terintegrasi: Optimalisasi Implementasi Smart Mobility di DKI Jakarta,” *Journal Of Public Policy and Applied Administration*, 2023, 47–58, <https://doi.org/10.32834/jplan.v5i2.676>.

along with options for case settlement via litigation or non-litigation. This study emphasizes that the enforcement of transportation regulations must be improved to realize the principle of *maslahah*, namely maintaining public safety and comfort in using public transportation.¹⁵

6. A study conducted by Muhammad Hendra Cahyadi titled “The Implementation of Pekanbaru Mayoral Regulation Number 26 of 2019 concerning Guidelines for the Implementation of Electronic Tickets in Trans Metro Pekanbaru Mass Transportation” analyzes the implementation of the electronic ticket policy in the public transportation sector. The focus of the study is the effectiveness of the regulation's implementation as well as the technical obstacles in its field application. This research employs an empirical juridical approach with data collection through observation and interviews. The research findings indicate that the electronic ticket policy in Pekanbaru is quite effective in improving service efficiency, but it still faces obstacles in technical aspects and coordination among implementing agencies. The difference between Cahyadi's study and this research lies in the direction of the analysis and the value approach used. Cahyadi's research emphasizes the effectiveness of the policy from a technical-administrative perspective, such as system integration and operational implementation in the field. Meanwhile, this research focuses on the aspects of legal applicability and the social utility of the e-ticket policy as an instrument for

¹⁵ Ayuning Tyas Azis Putri et al., “Perlindungan Hukum Terhadap Penumpang Angkutan Umum Yang Mengalami Tindakan Overload,” *Jurnal Jendela Hukum* 10, no. 1 (2023): 36–45, <https://doi.org/10.24929/jjh.v10i1.2844>.

consumer protection in public transportation services. In addition to assessing the effectiveness of the implementation of Surabaya Mayoral Regulation Number 22 of 2023, this study also utilizes a masalah analysis to determine the extent to which the policy provides tangible benefits, justice, and welfare for public transportation users.¹⁶

7. A study conducted by Widya Dharmawan titled “The Implementation of Trans Semanggi Suroboyo Bus Smart Mobility as a Form of Efficiency in Public Transportation Governance” discusses digital transportation policy in Surabaya, focusing on improving efficiency and inter-agency coordination in technology-based public services. The research findings indicate progress in the aspects of communication and policy implementation, but there are still obstacles in the form of limited fleets and supporting facilities. The study assesses the success of the policy from the administrative and technical aspects of providing transportation services. In contrast, this research examines digital transportation policy from the perspective of legal effectiveness and social masalah, positioning regional regulations as legal instruments that not only regulate the technicalities of the service but also guarantee justice and utility for the user community.¹⁷

¹⁶ Muhammad Hendra Cahyadi, “Implementasi Peraturan Walikota Pekanbaru Nomor 26 Tahun 2019 Tentang Pedoman Penyelenggaraan Tiket Elektronik Pada Angkutan Massal Trans Metro Pekanbaru,” *JIANA (Jurnal Ilmu Administrasi Negara)* 23, no. 2 SE-Articles (31 Agustus 2025): 205–16, <https://doi.org/10.46730/jiana.v23i2.8296>.

¹⁷ Widya Dharmawan et al., “Implementasi Smart Mobility Bus Trans Semanggi Suroboyo Sebagai Bentuk Efisiensi Tata kelola Transportasi Publik,” *VISA: Journal of Vision and Ideas* 4, no. 3 SE-Articles (21 Agustus 2024): 1372 – 1384, <https://doi.org/10.47467/visa.v4i3.2882>.

8. A study conducted by Arief Rahman Prayoga titled “The Responsibility of PT Transjakarta in the Implementation of E-Ticketing Facilities for Transjakarta Service Users” reviews the responsibility of public transportation service providers in implementing the electronic ticket system for Transjakarta users. This research emphasizes how the regionally-owned enterprise fulfills its legal obligations to consumers and the form of legal protection provided when disruptions occur in the e-ticket system. The research findings indicate that the applied liability mechanism is functioning, but remains weak in the aspects of supervision and user complaint resolution, meaning that the effectiveness of legal protection has not been fully achieved. In contrast to that study, this research does not solely examine the issue of the service provider's responsibility, but rather explores the extent to which regional legal policies are able to function practically through the implementation of e-tickets in Surabaya. The focus is not on the business actors, but on the utility of regional regulations in creating order, usefulness, and *maslahah* for public transportation users. Thus, this research provides a broader new dimension by connecting legal effectiveness with the social values that emerge in digital public policy practices.¹⁸
9. A study conducted by All Rehadis in 2022 titled “The Implementation of Pekanbaru Mayoral Regulation Number 26 of 2019 concerning Guidelines for the Implementation of Electronic Tickets in Trans Metro Pekanbaru Mass

¹⁸ Arief Rahman Prayoga, “Tanggungjawab PT Transjakarta Dalam Pelaksanaan Fasilitas E-Ticketing Terhadap Pengguna Jasa Transjakarta” (Universitas Pembangunan Nasional Veteran Jakarta, 2019).

Transportation” focuses on the application of local government policy regarding the electronic ticket (e-ticketing) system in the public transportation sector. This research is motivated by the low effectiveness of the implementation of the established Mayoral Regulation, as in practice, many fleets have not yet implemented the e-ticket system and the majority of passengers still use cash payments. The research method used is a sociological juridical approach with data collection techniques through observation, interviews, and documentation from the Pekanbaru Department of Transportation and Trans Metro Pekanbaru service users. The research findings indicate that the implementation of Mayoral Regulation Number 26 of 2019 has not been optimal due to infrastructure factors, human resources, and minimal socialization. Furthermore, the level of public awareness regarding the use of e-tickets is still low. This study emphasizes the importance of regulatory enforcement, the provision of adequate infrastructure, and the enhancement of public digital literacy so that the e-ticket policy can be effectively implemented in accordance with the objectives of regional administrative law, namely providing convenience, transparency, and security for public transportation users.¹⁹

10. A study conducted by Veranita Yulia Manuari Suratno in 2023 titled “Study on the Effectiveness Level of E-Ticketing Use by Passengers of Batik Solo Trans Rapid Transit Bus (Surakarta)” focuses on analyzing the extent to

¹⁹ A L L Rehadis, “Penerapan Peraturan Walikota Pekanbaru Nomor 26 Tahun 2019 Tentang Pedoman Penyelenggaraan Tiket Elektronik Pada Angkutan Massal Trans Metro Pekanbaru” (Universitas Islam Negeri Sultan Syarif Kasim Riau, 2022), <https://repository.uin-suska.ac.id/id/eprint/58536/>.

which the electronic ticket system implemented in public transportation in Surakarta City is effective in improving the efficiency of public transportation services. This research is motivated by the need of the Surakarta City Government to assess the success of the e-ticket system implementation as part of the digital-based service transformation in the transportation sector. The research method used is a mixed-methods approach (quantitative and qualitative) utilizing questionnaires, interviews, and descriptive statistical analysis on Batik Solo Trans e-ticket users. The research findings indicate that the effectiveness level of e-ticket usage is still relatively low, with an effectiveness score of around 46%. Factors that have performed well are ease of use and user satisfaction, while factors that are not yet optimal include cost efficiency, transaction speed, and regulatory support. This study emphasizes that the implementation of e-tickets on public buses requires the support of regional legal policies, the improvement of digital infrastructure, and public education so that the system can function effectively and support the principles of transparency and accountability in public services.²⁰

Table 2. 1 Previous Research

No.	Researchers Name, Title, Year	Similarities	Differences
1.	Devi Febriliyanti Putri. "Implementasi Perda Kota Magelang Nomor 5 Tahun 2018 Tentang Inovasi Daerah Dalam	Examining the role of regional regulations in supporting the smart city concept.	Focuses on government innovation, whereas this research focuses on the public

²⁰ Veranita Yulia Manuari Suratno dan Andri Kurniawan, "Kajian Tingkat Efektivitas Penggunaan E-Ticketing Oleh Penumpang Batik Solo Trans Di Surakarta Dan Sekitarnya," *Jurnal Bumi Indonesia* 2, no. 3 (2013).

No.	Researchers Name, Title, Year	Similarities	Differences
	Rangka Mewujudkan Smart City di Kota Magelang (Studi Kasus Fitur Monggo Lapor Pada Aplikasi Magelang Cerdas)". 2023		transportation sector through e-tickets.
2.	Anita Ratnasari Rahmatullah. "Integrasi Antar Transportasi Umum di Kota Semarang". 2022	Both studies examine public transportation policies and the effectiveness of their implementation.	The previous research focuses on the physical integration between modes, whereas this study emphasizes digital integration through e-tickets.
3.	Nurul Fikri. "Analisis Hukum Ekonomi Terhadap Kebijakan Angkutan Umum di Kota Medan; Perspektif Al-Maslahah" 2025	Both studies employ the <i>maslahah</i> approach and Islamic economic law perspective.	The research focuses on Medan and does not address the digitalization of e-ticket policies, but rather the general quality of public services.
4.	Audrea Maria Margaretha dan Alih Aji Nugroho. "Transportasi Publik Terintegrasi: Optimalisasi Implementasi Smart Mobility di DKI Jakarta". 2025	Both studies discuss the digitalization of public transportation within the context of a smart city.	The previous research focuses on intermodal integration in Jakarta, rather than the legal effectiveness of regional transportation regulations.
5.	Ayuning Tyas Azis Putri. "Perlindungan Hukum Terhadap Penumpang Angkutan Umum Yang Mengalami Tindakan Overload". 2023.	Both studies discuss the digitalization of public transportation within the context of a smart city.	The previous research focuses on intermodal integration in Jakarta, rather than the legal effectiveness of regional transportation regulations.

No.	Researchers Name, Title, Year	Similarities	Differences
6.	Muhammad Hendra Cahyadi. “Implementasi Peraturan Wali Kota Pekanbaru No. 26 Tahun 2019 Tentang Pedoman Penyelenggaraan Tiket Elektronik pada Angkutan Massal Trans Metro Pekanbaru” (2025)	Both studies examine the effectiveness of e-ticket policies and the implementation of regional regulations.	The previous study focuses on administrative and technical aspects, whereas this research evaluates the policy from the perspective of legal effectiveness and <i>masalah</i> .
7.	Widya dharmawan. “Implementasi Smart Mobility Bus Trans Semanggi Suroboyo Sebagai Bentuk Efisiensi Tata kelola Transportasi Publik”, 2024	Both studies discuss digital transportation policies in Surabaya.	The previous study highlights administrative aspects, while this research evaluates legal effectiveness and social <i>masalah</i> .
8.	Arief Rahman Prayoga. “Tanggung Jawab PT Transjakarta dalam Pelaksanaan Fasilitas E-Ticketing terhadap Pengguna Jasa Transjakarta”. 2024	Both studies discuss the implementation of e-ticketing in public transportation.	The previous research focuses on the responsibility of business actors, whereas this study focuses on the effectiveness of mayoral regulations as a regional legal instrument.

No.	Researchers Name, Title, Year	Similarities	Differences
9.	All Rehadis. "Implementasi Peraturan Walikota Pekanbaru Nomor 26 Tahun 2019 Tentang Pedoman Penyelenggaraan Tiket Elektronik pada Angkutan Massal Trans Metro Pekanbaru". 2022	Both studies discuss the implementation of e-ticket policies in public transportation, which are regulated by Mayoral Regulations as the regional legal basis.	The difference lies in the research focus, which only reviews administrative and technical implementation aspects without utilizing a legal effectiveness approach or the concept of <i>masalah</i> .
10.	Veranita Yulia Manuari Suratno. "Kajian Tingkat Efektivitas Penggunaan E-Ticketing oleh Penumpang Bus Rapid Transit Batik Solo Trans (Surakarta)". 2023	Both studies examine the implementation of royalty payments by café business operators to song creators.	Veranita's research focuses more on empirical user satisfaction, whereas this study examines the legal effectiveness of Mayoral Regulation Number 22 of 2023 from a <i>masalah</i> perspective.

B. Theoretical Framework

1. Legal Effectiveness

According to Soerjono Soekanto's theory of legal effectiveness, a law is considered effective if its intended goals can be achieved to a certain extent and if it produces positive legal consequences. In this way, the law can indirectly achieve its purpose of directing human behavior, thereby shaping personal conduct that is grounded in the spirit of the law. Discussing legal effectiveness means examining how effectively the law regulates and

enforces rules to ensure compliance. A law is deemed acceptable when the community exhibits behaviors that align with shared goals and ideals. Therefore, if a regulation contains a coercive element, the presence of such coercion is closely related to whether or not a legal provision is effective.²¹

The effectiveness of a law, according to Soerjono Soekanto, can be observed through several factors. These factors include:

a. Legal Factor

The first factor is the law or legislation itself. There are several principles aimed at ensuring that the law has a positive impact, which include:

- 1) Laws do not apply retroactively, this means a law may only be applied to events specified therein that occur after the law has been declared effective.
- 2) Laws enacted by a higher authority hold a higher hierarchical position.
- 3) A specific law overrides a general law if enacted by the same authority. This means that a specific event must be governed by the law explicitly addressing it, even if the event could also be governed by a broader or more general law that encompasses the specific event.

²¹ Soerjono Soekanto, "Efektivitas hukum dan penerapan sanksi," *Bandung: CV. Ramadja Karya* 80 (1988).

- 4) A later law repeals an earlier law. This means that a previously enacted law regulating a specific matter is no longer valid if a new, subsequently enacted law governs the same matter but with a different or opposing meaning or purpose.
- 5) Laws are inviolable.
- 6) The law is a means to achieve spiritual and material well-being for both society and individuals through innovation. This is to ensure that lawmakers do not act arbitrarily and that the law does not become a dead letter.

b. Law Enforcement Factor

Law enforcers are individuals who create and enforce the law. They hold a position and role in the implementation of the law. As role models within society, law enforcers should possess certain capabilities in accordance with the aspirations of the community. They must be able to communicate effectively and gain understanding from the public, while also being capable of carrying out roles that are accepted by society.

c. Actors of Facilities and Infrastructure.

Law enforcement facilities and infrastructure are intended to support the smooth execution of duties in the workplace in order to achieve legal effectiveness. Soerjono Soekanto established standards regarding the effectiveness of certain elements of facilities and infrastructure that must be fulfilled. These elements include:

- 1) What is unavailable should be provided immediately.
- 2) What is damaged should be repaired or fixed.
- 3) What is lacking should be supplemented.
- 4) What is obstructed should be facilitated or made smooth.
- 5) What has declined should be improved or enhanced.

d. Community Factors

This factor is viewed from the environment or place where the law is implemented, including whether the community is highly compliant with regulations or, conversely, does not obey the regulations even though the rules are already well-established, the authorities are highly competent, and the facilities are adequate. In addition, it also concerns whether the socialization or dissemination of information provided to the community has been delivered effectively.

e. Cultural Factor

According to Soerjono Soekanto, culture functions to regulate society so that people are able to act and behave properly and courteously. In essence, culture includes the values that underlie the application of law. These paired values are peace and order.²²

²² Soerjono Soekanto, *Faktor Faktor yang Mempengaruhi Penegakan Hukum* (Depok: Rajawali Press, 2022), 11-13.

2. Maslahah

a. Definition

The term Maslahah originates from as-salah (goodness, usefulness, validity, and truth), which indicates that something exists in its optimal form according to its intended purpose or objective. For example, a pen reaches its most appropriate form when it is used for writing. In this context, maslahah can be interpreted as an effort to obtain benefits and avoid harm. In general, maslahah is defined as a factor that causes goodness and benefit.²³

Linguistically, the word mashlahah is derived from the term mashalih, which means something good or beneficial and serves as the antonym of harm (mafsadah). Occasionally, mashlahah is also referred to as ishlahah, which signifies the pursuit of something good. According to shara' (Islamic law), mashlahah is defined as the causal factor that leads to the objectives of the Lawgiver, pertaining to both matters of worship (ibadah) and social customs (adat). There are two types of mashlahah: those prescribed by the Lawgiver for His own sake, such as worship, and those intended for the well-being of His creation and the regulation of their affairs, such as customary regulations.²⁴

²³ Bahrul Hamdi, "Konsep Implementasi Mashlahah Menurut Al-Ghazali, Asy-Syatibi Dan Najmuddin At-Thufi (Studi Komparatif Analitis Pemikiran Hukum Islam)," *Al-Hurriyah: Jurnal Hukum Islam* 2, no. 2 SE-Articles (5 Maret 2018): 219–31, <https://doi.org/10.30983/alhurriyah.v2i2.402>.

²⁴ Abdul Latip, *Ushul Fiqih dan Kaedah Ekonomi Syariah* (Merdeka Kreasi Group, 2022).

It can be concluded that the intended *mashlahah* refers to the welfare that serves as the objective of sharia, rather than benefits based solely on human whims and desires. This is because it is fully recognized that the purpose of legal enactment (*tashri'*) is none other than to bring benefit to humanity across all aspects of their worldly lives and to prevent any form of harm (*mafsadah*). In other words, every legal provision stipulated by the Lawgiver is aimed at ensuring the well-being of all humanity.²⁵

b. Classifications of *Mashlahah*

In the discussion of *mashlahah* as a legal basis, it is not solely based on rational considerations of good and evil or commands and prohibitions, but it must also align with the objectives of Sharia used in legal determination. Jurists classify *mashlahah* into several categories as follows:

1. In terms of the quality and significance of benefit as a legal authority for legal determination, *mashlahah* is divided into three types:²⁶
 - a) *Mashlahah Dharuriyah* (Essentials), which refers to benefits that are vital to human life and equivalent to primary needs. These consist of five essentials: the protection of religion, life, intellect, lineage, and property.

²⁵ Muhammad Sulthon, "Mashlahah sebagai tujuan inti pembentukan hukum Islam," *Jurnal Darussalam: Jurnal Pendidikan, Komunikasi Dan Pemikiran Hukum Islam* 14, no. 2 (2023): 39–55, <https://ejournal.iaida.ac.id/index.php/darussalam/article/view/2024/1262>.

²⁶ Muhamad Ari Arifin, "Studi Analisis Kedudukan Masalah Mursalah Sebagai Salah Satu Sumber Hukum Islam: Studi Analisis Kedudukan Masalah Mursalah Sebagai Salah Satu Sumber Hukum Islam," *RIBHUNA: Jurnal Keuangan dan Perbankan Syariah* 2, no. 2 (2023): 74–84.

- b) *Mashlahah Hajiyah* (Needs), which refers to the level of benefit used to complement the essentials in the form of dispensations to safeguard and maintain basic human needs. An example in worship is the permission to shorten (*qashr*) prayers and break the fast for travelers (*musafir*).
 - c) *Mashlahah Tashiniyah* (Embellishments), which refers to the level of benefit that does not meet the criteria of *dharuri* or *haji*, but is necessary for perfection and as a complement to human life. Examples include recommendations to consume nutritious food and drinks, and performing sunnah acts of worship.
2. In terms of the existence of *mashlahah* according to the testimony of Sharia whether recognized and legitimized or otherwise it is categorized into three types as follows:²⁷
- a) *Mashlahah Mu'tabarah*, which is benefit supported by Sharia either directly or indirectly, where specific evidence serves as the basis for the form and type of benefit used as legal authority. For example, scholars agree to apply analogical reasoning (*qiyas*) to the prohibition of intoxicating date wine, which lacks a specific text (*nash*), by equating it to the prohibition of intoxicating grape wine found in the Quran and Hadith.

²⁷ Sahibul Ardi, "Konsep Maslahah Dalam Perspektif Ushuliyyin," *An-Nahdhah| Jurnal Ilmiah Keagamaan Dan Kemasyarakatan* 10, no. 2 (2017): 233–58.

- b) *Mashlahah Al-Mulghah*, which is benefit rejected by Sharia because it contradicts Sharia provisions; in other words, it is a benefit nullified by scriptural evidence or prohibited from use. This nullification occurs because the benefit is outweighed by the harm, or because the perceived benefit itself may lead to harm.
- c) *Mashlahah al-Mursalah*, which is benefit that is neither supported nor rejected by Sharia, as there are no scriptural indicators that explicitly acknowledge or dismiss it.
3. In terms of the substance of *mashlahah* jurists classify it into two categories:²⁸
- a) *Mashlahah Al-'Ammah*, which refers to the public interest concerning the collective welfare of the people. The collective welfare does not imply the interest of every single individual, but rather the interest of the majority of the community.
- b) *Mashlahah Al-Khashah*, which refers to private interest that is individual in nature and occurs infrequently. An example is the dissolution of marriage for a person declared missing (*mafqud*).
4. In terms of its mutability or immutability, *mashlahah* is divided into two forms:²⁹

²⁸ Rifaki Asy'ari, "Mashlahah dalam Maqasid Syari'ah," *Ta'wiluna: Jurnal Ilmu Al-Qur'an, Tafsir dan Pemikiran Islam*, 2022.

²⁹ Sagita Nur Aulia Rahmarani, "Kajian Masalahah terhadap izin perkawinan beda agama: Studi kasus penetapan perkara No. 916/Pdt. P/2022/PN. Sby" (Universitas Islam Negeri Maulana Malik Ibrahim, 2024).

- a) *Mashlahah At-Tsabitah* (Permanent Benefits), which refers to immutable benefits that remain unchanged until the end of time, such as various obligations of worship like prayer, fasting, and pilgrimage.
- b) *Mashlahah Al-Mutaghayyirah* (Mutable Benefits), which refers to benefits that change in accordance with variations in place, time, and legal subjects. These benefits pertain to matters of social transactions (*muamalah*) and customary practices (*adat*).

3. Smart City Concept

a. Definition of Smart City

A smart city is an urban region that has integrated Information and Communication Technology (ICT) into daily governance to optimize efficiency, improve public services, and enhance citizen welfare. This technological integration is facilitated by the Internet of Things (IoT), a network of interconnected electronic devices capable of transmitting data and executing actions with human intervention. In Indonesia, the implementation of the smart city concept faces several challenges, ranging from inadequate supporting infrastructure and the readiness of local governments to the limited capacity of the public to fully utilize digital technology.³⁰

³⁰ Dedi Supriyadi, *Konsep Smart City Dalam Pembangunan Kota di Indonesia* (Jakarta: Pustaka Ceria, 2018).

The development of Smart Cities is legally grounded in Law No. 23 of 2014 concerning Regional Government. Article 386 stipulates that innovation refers to all forms of renewal, including the application of scientific and technological advancements, as well as new findings in the administration of government. This regional innovation policy is guided by the principles of increasing efficiency, improving effectiveness, enhancing service quality, avoiding conflicts of interest, orienting toward the public interest, maintaining transparency, adhering to the values of propriety, and ensuring accountable results that are not for personal gain.³¹

A city can be categorized as a Smart City if it has integrated information and communication technology to a certain level within its daily governance and operational processes. In Indonesia, several major cities have begun adopting this concept; for instance, Jakarta has implemented Smart City initiatives since 2014. Similarly, Surabaya continues to introduce innovations to achieve Smart City status, such as the implementation of an online traffic ticket system (e-tilang) for motorists who commit traffic violations.

b. Dimensions of Smart City

The United States and Europe are the pioneers of the Smart City concept globally, with IBM being the leading corporation that

³¹ Gista Aprilia, "Komunikasi Inovasi Transaksi Elektronik Melalui Program Smart Card di Kota Pekanbaru" (UNIVERSITAS ISLAM NEGERI SULTAN SYARIF KASIM RIAU, 2019).

spearheaded its establishment and global implementation. IBM developed the IBM Smarter Planet framework, which is built upon a vision of being interconnected, instrumented, and intelligent. Under this framework, IBM classifies the Smart City into six dimensions: smart economy, which focuses on enhancing urban economic competitiveness and innovation; smart mobility, which specializes in efficient and technology-based transportation systems to minimize congestion and traffic violations; smart governance, which emphasizes the efficiency and transparency of public services and administration; smart people, which involves developing tech-savvy citizens who participate actively in city life; smart living, which aims to improve the quality of life through smart and safe public facilities; and smart environment, which focuses on sustainable management through sensor technology and digital systems.³²

³² Khamaludin Khamaludin et al., *SMART CITY: Teori dan Penerapan* (PT. Sonpedia Publishing Indonesia, 2024).

CHAPTER III

RESEARCH METHODS

A. Type of Research

Based on the research title and the problem formulation mentioned above, this study utilizes an Empirical Juridical research method. Empirical juridical research is a legal study that examines prevailing legal provisions alongside the actual realities occurring within society, with the aim of uncovering facts to be used as research data. This data is then analyzed to identify issues, ultimately leading toward a resolution of the problem.³³

In this undergraduate thesis, the problem addressed is the implementation of Surabaya Mayoral Regulation Number 22 of 2023, Articles 14 and 15, regarding the application of the electronic ticketing (e-ticket) system at Bungurasih Terminal in supporting the Smart City concept, analyzed from the perspective of *masalah*.

B. Research Approach

The research approach that will be used in this study is the socio-legal (sociological-juridical) approach. The socio-legal approach examines the law by integrating legal studies and social sciences. Socio-legal research has distinct characteristics, namely: first, it discusses the implementation of law in society, rather than focusing solely on the law written in books or legislation. Second, it relies on empirical evidence. Third, its validity is based on the factual reality of

³³ Kornelius Benuf dan Muhamad Azhar, "Metodologi Penelitian Hukum sebagai Instrumen Mengurai Permasalahan Hukum Kontemporer," *Gema Keadilan; Vol 7, No 1 (2020)*, 1 April 2020, <https://doi.org/10.14710/gk.2020.7504>.

the law. Fourth, its data emphasizes understanding the meaning within the thoughts or ideas of the researcher regarding legal actions taken by individuals.³⁴

The socio-legal research in this study will examine the implementation of the Surabaya Mayor Regulation Number 22 of 2023, Articles 14 and 15, concerning electronic tickets (e-tickets) at Bungurasih Terminal. It observes how the e-ticket system is implemented by Bungurasih Terminal under the authority of the Ministry of Transportation, and analyzes it using the *maslahah* (public interest) perspective to assess the extent to which this policy provides benefits and welfare for public transportation users.

C. Research Location

The researcher selected the research location at the Ministry of Transportation of Surabaya City, located at the East Java Class II office on Jl. Menanggal MGE No. 12, Gayungan, Surabaya 60234..

D. Data Source

The types of data used in this study are,³⁵ as follows:

1. Primary Data

Primary data are data obtained directly from the field and constitute the main data used as material for empirical juridical research. In this study, the primary data were obtained through interviews and observations. The researcher conducted oral interviews with the Head of the Class II Type A

³⁴ Muhammad Chairul Huda dan M H S HI, *Metode Penelitian Hukum (Pendekatan Yuridis Sosiologis)* (The Mahfud Ridwan Institute, 2021).

³⁵ Zainuddin Ali, *Metode penelitian hukum* (Sinar Grafika, 2021).

Terminal of East Java, as well as officials and staff at the Class II East Java Land Transportation Management Center who are responsible for the operations and services at Bungurasih Terminal.

2. Secondary Data

Secondary data is obtained through a review of literature relevant to the research problem and subject matter, commonly referred to as legal materials. The secondary data sources utilized include books, journals, academic papers, and legislation related to this research topic.

E. Data Collection Methods

Several data collection techniques used in this study are as follows:

1. Interview

The type of interview used in this study is a semi-structured interview, in which the interviewer has prepared the topics and a list of questions prior to conducting the interview.³⁶ The interview involves direct question-and-answer interactions between the researcher and the informants to obtain information, so that the data received by the researcher can be analyzed based on the phenomena that occur.

2. Documentation

Documentation is a record of events during research, in the form of written or recorded documents. Recorded documents can be images (photographs) and audio or video recordings, while written documents consist of archives and notes related to the research problem and facts in the

³⁶ Ridwan Ridwan, "Metode penelitian" (Yayasan Sahabat Alam Rafflesia, 2024).

field. In this study, recorded documentation takes the form of photos and several audio recordings, while written documentation consists of notes.

3. Observation

Observation is an initial review activity conducted directly at the research site to obtain a factual overview of field conditions. This activity is carried out through note-taking, photographing, and recording the situations, conditions, and legal events that occur in relation to policy implementation. The purpose of this observation is to collect empirical data regarding the alignment between normative provisions in legislation and their practical implementation in the field.

In this study, two stages of observation were conducted, namely pre-research observation and research observation. The pre-research observation was carried out to identify initial issues, understand the flow of transportation services, and obtain a general overview of the electronic ticket (e-ticket) system's implementation at Bungurasih Terminal. Meanwhile, the research observation was conducted more comprehensively by directly observing the operational processes of ticket services, cashless payment mechanisms, the utilization of e-ticketing facilities, as well as the behavior of the staff and transportation service users.

F. Data Processing Methods

This study will be examined using a qualitative method, which is a method that reveals facts in depth based on the scientific characteristics of individuals or groups to understand and uncover the underlying aspects of a

phenomenon.³⁷ This method will elaborate on both primary and secondary data in detail to make the findings more specific. The data processing in this study includes data examination, data classification, data verification, data analysis, and drawing conclusions.

The stages of research data processing are as follows³⁸:

1. Data Examination (Editing)

The data examination (editing) stage in processing empirical research data is an important process to ensure that the collected data is ready for further analysis. Editing involves examining and correcting data to ensure that it is accurate, consistent, and ready for use. The steps and techniques commonly performed during the data examination stage include checking for data errors, verifying accuracy and consistency, validating the data, as well as carefully preparing and storing the data.³⁹

2. Data Classification (Classifying)

The classification stage in data processing is the process of grouping data into certain categories or classes to facilitate analysis and interpretation. Classification helps researchers organize complex data into a more structured and manageable format. The steps carried out in the classification stage include identifying categories or classes, grouping the data, and conducting classification analysis.

³⁷ S H Suyanto, *Metode Penelitian Hukum Pengantar Penelitian Normatif, Empiris Dan Gabungan* (Unigres Press, 2023).

³⁸ Andi Prastowo, "Metode penelitian kualitatif dalam perspektif rancangan penelitian," 2012.

³⁹ H Rifa'i Abubakar, *Pengantar metodologi penelitian* (SUKA-Press UIN Sunan Kalijaga, 2021).

3. Data Verification (Verifying)

The verification stage in data processing is the process of checking the accuracy, consistency, and validity of the collected data. The main purpose of verification is to ensure that the data used in the analysis truly reflects reality and can be relied upon.⁴⁰

The author verified the findings obtained from the interviews by listening again to the interview recordings with the informants. Subsequently, the author compared the written interview results with the informants' statements to ensure the accuracy and consistency of the information obtained. In addition, the author verified the documentation in the form of photographs by checking the time and location where the photos were taken to ensure the authenticity of the materials. The photographs and notes were then shown to the related parties to confirm the validity of the existing information. Finally, the author compared the interview results with the documentation to ensure the consistency of the findings obtained from both sources.

4. Data Analysis (Analyzing)

The data analysis stage in data processing is the process of evaluating and interpreting the data that have been collected, classified, and examined in order to draw conclusions and answer the research questions. This step is very important because the results of the analysis determine the contribution of the research to knowledge and practice in the field being studied. The

⁴⁰ Muhaimin, *Metode Penelitian Hukum* (Mataram: Mataram University Press, 2020).

steps commonly used in the data analysis stage include preparing the data for analysis, analyzing the data qualitatively, and presenting the data.

5. Conclusion (Concluding)

The conclusion is the final stage in data processing. At this stage, conclusions are drawn from the entire discussion in a concise and clear manner. The conclusions are derived from the results of the analysis whose validity has been verified, both through empirical evidence and consistency with relevant theories. At this stage, the researcher will present the key points in order to provide answers to the questions stated in the formulation of the problem.

CHAPTER IV

RESULT AND DISCUSSION

A. General Overview of the Research Location

1. General Overview of the City of Surabaya

The City of Surabaya is the capital of East Java Province and one of the largest metropolitan cities in Indonesia. As a center of government, economy, trade, services, education, and various other social activities, Surabaya has a significant strategic role in the eastern region of Indonesia. Its geographical position on the northern coast of Java Island makes the city a major hub of the national transportation and logistics network, resulting in a high intensity of population and goods mobility every day.

The City of Surabaya, which consists mainly of lowland areas, experiences air temperatures ranging from 27.3°C to 30°C. October has the highest average temperature, while July has the lowest average temperature. The administrative area of Surabaya is divided into five assistant administrative regions, namely Central Surabaya, East Surabaya, West Surabaya, North Surabaya, and South Surabaya. Each of these regions consists of several districts. The following is a list of districts in each region.⁴¹

- a. Central Surabaya this region consists of Tegalsari, Simokerto, Genteng, and Bubutan Districts.

⁴¹ Badan Pusat Statistik Kota Surabaya, “Surabaya Dalam Angka 2024” (Surabaya, 2024).

- b. East Surabaya this region consists of the districts of Gubeng, Gunung Anyar, Sukolilo, Tambaksari, Mulyorejo, Rungkut, and Tenggilis Mejoyo.
- c. West Surabaya this region consists of the districts of Benowo, Pakal, Asem Rowo, Sukomanunggal, Tandes, Sambikerep, and Lakarsantri.
- d. North Surabaya this region consists of the districts of Bulak, Kenjeran, Semampir, Pabean Cantikan, and Krembangan.
- e. South Surabaya this region consists of the districts of Wonokromo, Wonocolo, Wiyung, Karang Pilang, Jambangan, Gayungan, Dukuh Pakis, and Sawahan.

The City of Surabaya has an area of approximately 326.81 km², which includes 31 districts and several urban villages. Based on the results of the 2020 Population Census, the population of Surabaya was recorded at around 2.87 million people, with a population density of approximately 8,795 people per km². At the provincial level, Surabaya is the city with the largest population in East Java. The city accounts for around 7.23% of the total provincial population, which reached more than 41 million people in mid-2024. These data indicate that Surabaya is one of the most densely populated cities in Indonesia.⁴²

2. Profile of Bungurasih Terminal

Bungurasih Terminal is the largest bus terminal in East Java and serves as the primary transportation hub connecting Surabaya with various

⁴² Berita Resmi Statistik, "Hasil Sensus Penduduk 2020 Kota Surabaya" (Surabaya, 2021).

regions within East Java as well as other provinces. The terminal is located in Waru District, Sidoarjo Regency, right on the border of Surabaya. It was built in 1989, inaugurated on March 11, 1991, and began operating in 1984. The terminal covers a land area of approximately 10 hectares with a capacity reaching 10,000 passengers per day.⁴³

This terminal is equipped with several facilities, including a parking area for 500 buses, public restrooms, and a medical post. In addition to these facilities, Bungurasih Terminal also features passenger waiting rooms, ticket counters, an information area, a prayer room, a cafeteria, and a commercial area used by merchants and small business owners. These facilities aim to provide comfort, security, and convenience for passengers while in the terminal area. The arrival and departure zones are also separated to regulate the flow of passengers and vehicles, ensuring a more orderly environment.

The management of Bungurasih Terminal falls under the authority of the central government through the Ministry of Transportation, specifically via the Class II Land Transportation Management Center (BPTD) of East Java.⁴⁴ Operational management is conducted in a structured manner, encompassing the regulation of bus departure schedules, route organization, safety supervision, and passenger services. Institutionally, the terminal's management is under the coordination of the

⁴³ Frisilia Ayu, "Terminal Bungurasih Sidoarjo, Terminal Terbesar di Jawa Timur," *beritajatim.com*, 2024, <https://beritajatim.com/terminal-bungurasih-sidoarjo-terminal-terbesar-di-jawa-timur>.

⁴⁴ Pemerintah Kota Surabaya, "Pemkot Surabaya Serahkan Terminal Tipe A ke Kementerian Perhubungan RI," 2022, <https://www.surabaya.go.id/id/berita/65966/pemkot-surabaya-serahkan-terminal-tipe-a-purabaya-ke-kementerian-perhubungan-ri>.

terminal head, who is responsible for the planning, execution, and evaluation of all operational activities. Under this coordination, duties and responsibilities are divided into several work divisions, namely the traffic and transportation operations division, the passenger services division, the supervision and orderliness division, and the administration and infrastructure technical division.

In line with technological advancements, the management of Bungurasih Terminal not only manages conventional services but has also begun implementing various digital systems, such as electronic information boards, e-tickets, and passenger data integration.

3. The Role of Terminal Officers and Management

In the organization of transportation at Bungurasih Terminal, officers and terminal management play a crucial role in ensuring that passenger service activities run in an orderly and organized manner. This role is not only limited to operational aspects but also includes the functions of regulation, coordination, and information delivery to passengers as users of transportation services.⁴⁵

Based on the results of an interview with the Head of Bungurasih Terminal, the terminal management plays a role in regulating the flow of transportation activities taking place within the terminal area. This management is carried out through the regulation of passenger service flow, the positioning of vehicles in the departure area, and the supervision of

⁴⁵ Bambang Hermanto, Kepala Terminal Bungurasih, Wawancara (Surabaya, 4 Maret 2026)

operational activities conducted by bus companies. In addition, the terminal management also plays a role in coordinating with the bus companies operating at the terminal.

On the other hand, terminal officers on the ground play a role in providing direct services to passengers. This role is realized through the provision of information regarding the service flow, indicating the locations of available facilities, and directing passengers to the departure area. This supervision aims to ensure that all operational activities run in accordance with applicable regulations, as well as to maintain security and order within the terminal area.⁴⁶

B. The Effectiveness of Implementing Surabaya Mayor Regulation Number 22 of 2023 concerning Electronic Ticketing at Bungurasih Terminal

Surabaya Mayor Regulation Number 22 of 2023, specifically Article 14 and Article 15, constitutes the legal foundation governing the use of non-cash payment systems and electronic tickets (e-tickets) in the provision of public transportation in the City of Surabaya. Normatively, this policy stems from the drive to encourage the digitalization of transportation services, reduce scalping practices that have historically disadvantaged passengers, and improve the transparency and efficiency of terminal management. All of this is part of the grand vision of Surabaya as a Smart City.

⁴⁶ Niken Sri Wulandari, Petugas sarana dan prasarana transportasi, Bambang Hermanto, Kepala Terminal Bungurasih, Wawancara (Surabaya, 16 Januari 2026)

However, actual conditions on the ground indicate that the implementation of this policy has not yet been fully realized. Based on research conducted through direct interviews, several issues were found that require further investigation. One of these is that Purabaya Terminal is managed by the Class II East Java Land Transportation Management Center (BPTD), which falls under the Ministry of Transportation, rather than the Surabaya City Government.

To see the extent to which this policy is running optimally, this research utilizes the effectiveness theory according to Soerjono Soekanto as its analytical foundation. According to Soerjono Soekanto, there are five main factors that determine whether a legal rule can function well or not, namely: the legal factor itself, the law enforcement factor, the facilities and infrastructure factor, the community factor, and the cultural factor. The following is a discussion of each of these factors based on data obtained from the field.

1. The Legal Factor

The first factor that determines the effectiveness of law is the quality of the regulation itself. Soerjono Soekanto emphasizes that for a regulation to be effectively implemented, it must be formulated clearly, must not contain overlaps or contradictions with other regulations, and must be consistent with the applicable legislative hierarchy. If a regulation has defects

or weaknesses in terms of its substance or authority, its implementation in practice will encounter obstacles.⁴⁷

In this study, the legal factor is analyzed from two dimensions: first, the position and validity of Surabaya Mayor Regulation Number 22 of 2023 within the applicable legal system; and second, the conformity of the substance of the regulation with the objectives of administering public transportation that is orderly, efficient, and oriented toward public welfare.

a. Legal Position and Validity of Mayor Regulation Number 22 of 2023

One of the issues that emerged in the implementation of Mayor Regulation Number 22 of 2023 in practice is the assumption that this regulation does not have sufficient legal force because it is not directly based on or derived from a Regulation of the Minister of Transportation (Permenhub).

*“Terminal Tipe A Bungurasih memahami Peraturan Wali Kota Surabaya Nomor 22 Tahun 2023 sebagai kebijakan Pemerintah Daerah terkait penerapan electronic-ticket. Namun, sesuai Undang-Undang Nomor 23 Tahun 2014 tentang Pemerintahan Daerah, kewenangan pengelolaan Terminal Tipe A berada pada Pemerintah Pusat, sehingga dasar hukum operasional terminal mengacu pada kebijakan Kementerian Perhubungan, salah satunya Peraturan Menteri Perhubungan Nomor PM 24 Tahun 2021”.*⁴⁸

This assumption has ultimately become one of the reasons why the implementation of the e-ticket system at Bungurasih Terminal has not operated optimally, as if the absence of derivation from a Regulation of the Minister of Transportation (Permenhub) renders this regulation

⁴⁷ Djaenab Djaenab, “Efektifitas dan berfungsinya hukum dalam masyarakat,” *Ash-Shahabah: Jurnal Pendidikan Dan Studi Islam* 4, no. 2 (2018): 148–53.

⁴⁸ Bambang Hermanto, Kepala Terminal Bungurasih, Wawancara (Surabaya, 4 Maret 2026)

invalid or not fully binding. This view needs to be clarified academically based on the framework of the hierarchy of laws and regulations applicable in Indonesia.

Based on Law Number 12 of 2011 concerning the Formulation of Laws and Regulations, as amended by Law Number 15 of 2019, the hierarchy of laws and regulations in Indonesia is arranged vertically from the highest to the lowest as follows⁴⁹: the 1945 Constitution of the Republic of Indonesia, Decrees of the People's Consultative Assembly, Laws/Government Regulations in Lieu of Law, Government Regulations, Presidential Regulations, Provincial Regulations, and Regency/City Regional Regulations. Below Regency/City Regional Regulations are Regional Head Regulations, including Mayor Regulations (Perwali), which function as technical implementing regulations of the relevant Regional Regulations. Based on this hierarchical structure, a Mayor Regulation is not positioned under a Ministerial Regulation, but rather within the framework of regional autonomy derived from the Regional Government Law.

The authority of the Surabaya City Government to issue Mayoral Regulation Number 22 of 2023 is derived from the principle of regional autonomy mandated by Law Number 23 of 2014 concerning Regional Government. Based on this law, regency/city governments possess the

⁴⁹ Pemerintah Republik Indonesia, "Undang-undang (UU) Nomor 12 Tahun 2011 tentang Pembentukan Peraturan Perundang-Undangan" (Jakarta, 2011).

authority to regulate governmental affairs within their jurisdiction, including the transportation and transit sectors within the city limits. In the Appendix of Law No. 23 of 2014, local transportation matters such as the provision of passenger transport on urban routes, tariff determination, and payment mechanisms for regional transportation services are delegated to regency/city governments as concurrent governmental affairs. Consequently, the regulation of noncash payment systems through e-tickets for public transportation services in Surabaya City falls entirely within the authority of the Surabaya City Government.⁵⁰

Specifically, Mayoral Regulation Number 22 of 2023 was enacted as a technical-operational regulation derived from Surabaya City Regional Regulation Number 7 of 2006 concerning the Provision of Passenger Transport on Roads with Public Vehicles. This Regional Regulation serves as the legal framework underlying the issuance of this Mayoral Regulation. The relationship between the Regional Regulation and the Mayoral Regulation is hierarchical: the Regional Regulation constitutes a general and substantively binding norm, whereas the Mayoral Regulation acts as its technical-operational elaboration. Provided that the substance of the Mayoral Regulation does not contradict the underlying Regional Regulation or materially conflict with

⁵⁰ Pemerintah Republik Indonesia, “Undang-undang (UU) Nomor 23 Tahun 2014 tentang Pemerintahan Daerah Pasal 9 ayat (3)” (Jakarta, 2014).

higher laws and regulations, including the Minister of Transportation Regulation, the Mayoral Regulation remains legally valid and binds all parties within the jurisdiction of Surabaya City.

Therefore, the assumption that Mayoral Regulation Number 22 of 2023 is ineffective or invalid because it is not directly derived from the Minister of Transportation Regulation is juridically incorrect. The Minister of Transportation Regulation governs national and technical matters in the transportation sector, whereas the Mayoral Regulation is a regional legal instrument that regulates the operational aspects of transportation services within the city based on the authority of regional autonomy. Both exist on different regulatory pathways and are not in a direct *lex superior lex inferior* relationship. The crucial aspect to ensure is that the substance of the Mayoral Regulation does not contradict the Minister of Transportation Regulation, rather than requiring the Mayoral Regulation to be a direct derivative of it. Based on an examination of the substance of Mayoral Regulation Number 22 of 2023, no material conflict was found between the non-cash e-ticket payment system arrangements stipulated in the Mayoral Regulation and the provisions within the applicable Minister of Transportation Regulations.

b. Substantive Quality of Mayoral Regulation Number 22 of 2023 as a Legal Instrument

Viewed from its substance, Surabaya Mayoral Regulation Number 22 of 2023, specifically Articles 14 and 15, normatively contains

clear and directed provisions regarding the mandatory use of non-cash payment systems in public transportation services. These articles explicitly specify the payment instruments that must be utilized, namely QRIS, electronic money, the Surabaya City electronic ticket card, and the GoBis application. Thus, from the aspect of normative clarity and legal certainty, the substance of this Mayoral Regulation has fulfilled the principles of good legislation formation as stipulated in Law No. 12 of 2011, particularly the principles of clarity of purpose, implementability, and clarity of formulation.

When analyzed using the legal principles articulated by Soerjono Soekanto, Mayoral Regulation Number 22 of 2023 has fulfilled the necessary requirements for the law to have a positive impact. First, the principle of non-retroactivity is fulfilled because this Mayoral Regulation only governs the implementation of e-tickets prospectively from the time it is declared effective. Second, the principle of hierarchy is fulfilled because the Mayoral Regulation is a regulation born from valid regional autonomy authority based on Law No. 23 of 2014, grounded in Regional Regulation No. 7 of 2006 as its legal framework. Third, the principle of *lex specialis derogat legi generali* can be applied because the Mayoral Regulation specifically governs the e-ticket payment mechanism for transportation services in Surabaya City, which is more specific compared to general transportation provisions. Fourth, this Mayoral Regulation is the latest regulation governing non-cash payment

mechanisms for the Surabaya Transportation Agency's BLUD (*Badan Layanan Umum Daerah* / Regional Public Service Agency) services, thereby superseding older provisions that have not yet regulated a similar system."

- c. Jurisdictional Issues: Bungurasih Terminal and the Authority of the Land Transportation Management Center (BPTD) of the Ministry of Transportation

There is one crucial point that must be considered in this legal factor analysis. Institutionally, Bungurasih Terminal is under the management of the Class II Land Transportation Management Center (BPTD) of East Java, which is a Technical Implementing Unit (UPT) of the Ministry of Transportation of the Republic of Indonesia. As a Type A terminal serving intercity-interprovincial (AKAP) transport, Bungurasih Terminal falls under the jurisdiction of the central government through the Ministry of Transportation, rather than directly under the Surabaya City Government. This institutional condition is the critical point in understanding the legal factor issues within this research.

Given this jurisdictional difference, Mayoral Regulation Number 22 of 2023 as a legal product of the Surabaya City Government possesses full binding power over transportation services under the authority of the Surabaya City Government, specifically the city bus and inner-city transport services managed by the Surabaya Transportation

Agency's BLUD. Meanwhile, for AKAP bus services and Type A terminals under the Ministry of Transportation's BPTD, the implementation of e-tickets must refer to regulations issued by the central government through the Ministry of Transportation. The issues occurring at Bungurasih Terminal are, in fact, closely related to this dualism of authority. While the Surabaya Mayoral Regulation governs digital payments for services under the City Transportation Agency, its implementation within a terminal managed by the BPTD requires cross-institutional coordination and regulatory support from the central level.

A comparison with DKI Jakarta further clarifies the importance of comprehensive legal factors in the successful implementation of e-ticketing. The success of e-ticketing systems in Transjakarta and MRT Jakarta is not merely due to technological superiority, but because it is supported by comprehensive regulations, consistent enforcement, and clear authority at every level of the management agencies. Transjakarta is entirely under the DKI Jakarta Provincial Government; thus, there is no dualism of authority hindering regulatory implementation. A different situation occurs at Bungurasih Terminal, where the Surabaya City Government does not hold direct authority over all terminal operations. Therefore, the primary issue lies not in the quality of the Mayoral Regulation itself, but in the necessity for regulatory synchronization between the regional and central governments to cover the entirety of services at Bungurasih Terminal.

Based on the analysis above, it can be concluded that from the perspective of legal factors, Surabaya Mayoral Regulation Number 22 of 2023 is fundamentally a legitimate and valid legal product with adequate substantive quality as a digital transportation policy instrument. Its validity does not depend on a direct derivation from the Minister of Transportation Regulation, but rather stems from the authority of regional autonomy recognized by the constitution and national laws and regulations. The challenges that arise do not stem from the weaknesses of the Mayoral Regulation itself, but rather from the aspect of jurisdictional scope, which does not yet fully encompass the entire operation of Bungurasih Terminal as a Type A terminal under the central government's authority. This condition necessitates the strengthening of regulatory coordination between the Surabaya City Government and the Ministry of Transportation, specifically through the Class II Land Transportation Management Center (BPTD) of East Java, so that the e-ticket policy can be implemented comprehensively and provide optimal benefits (*mashlahah*) for all users of Bungurasih Terminal.

2. Law Enforcement Fact

The second factor is law enforcement, namely the parties responsible for implementing and supervising the application of regulations in the field. In the implementation of e-ticketing at Bungurasih Terminal, this role is held by the terminal management (Class II Land Transportation

Management Center/BPTD of East Java) along with the officers on daily duty.

Based on the research findings, the supervision conducted by the terminal authorities thus far includes operational monitoring, coordination with bus operators, and passenger order supervision. However, such supervision has not yet been specifically focused on ensuring the use of e-tickets by all operators.

A key point in this regard is that the terminal authorities do not impose sanctions on operators who continue to sell tickets manually. This is not due to officer indifference, but rather because there are no regulations that strictly mandate all operators to use e-tickets. Without a mandate accompanied by sanctions, the transition from a manual to a digital system will naturally be very slow.

*“Terminal tidak memberlakukan sanksi terhadap penggunaan tiket konvensional, karena belum terdapat ketentuan yang mewajibkan electronic-ticket sebagai sistem terminal”.*⁵¹

Soerjono Soekanto explains that law enforcers must possess sufficient capability, authority, and commitment to implement regulations. If law enforcers lack adequate instruments to enforce the rules, those affected by said regulations will likely be unwilling to comply.⁵²

On the other hand, terminal officers in the field have actually performed their roles well in terms of general public service, such as providing information to

⁵¹ Bambang Hermanto, Kepala Terminal Bungurasih, Wawancara (Surabaya, 4 Maret 2026)

⁵² Soekanto, *Faktor Faktor yang Mempengaruhi Penegakan Hukum*.

passengers and directing them to the e-ticketing lounge. However, this role has not yet been focused on enforcing the e-ticket mandate.

Currently, the terminal authorities are preparing a plan to develop a centralized ticket counter where all bus companies (PO) will be integrated into a single ticket booking system. In this system, passengers are required to possess a ticket before entering the waiting room, and all counters will utilize the e-ticketing system.

“Rencana dari terminal tahun ini yaitu ingin dibuatkan pemesanan loket sendiri, jadi semua PO dijadikan satu untuk pemesanan tiket, sebelum masuk ke ruang tunggu. Jadi sebelum penumpang naik atau masuk ke ruang tunggu harus mempunyai tiket. Tentunya yang ada di loket-loket itu memakai sistem e-ticketing.”⁵³

If this plan is realized, the e-ticket system will no longer be optional but will become a mandatory requirement for all passengers. This will significantly strengthen the role of law enforcement in the field by providing a clear basis for ensuring all parties follow the regulations."

3. Supporting Facilities and Infrastructure Factors

The third factor is the availability of adequate facilities and infrastructure. No matter how good a regulation may be, if it is not supported by adequate infrastructure, the regulation will not function properly. In the context of e-ticketing, the facilities referred to include ticket vending machines, e-ticketing lounges, internet networks, digital applications, and skilled human resources.

⁵³ Bambang Hermanto, Kepala Terminal Bungurasih, Wawancara (Surabaya, 4 Maret 2026)

Based on observations and interviews conducted in the field, the condition of e-ticketing facilities at Bungurasih Terminal has begun to become adequate, although it is still incomplete and not yet fully integrated. Several facilities are already available, including a number of e-ticketing lounges, particularly for city bus services such as Suroboyo Bus, Wira-Wiri, and Trans Jatim. There is also one ticket vending machine unit used to facilitate online ticket purchases from a particular bus operator. In addition, most intercity and interprovincial buses (AKAP) already provide online ticket purchasing services through various platforms such as Traveloka and RedBus.

“Terminal telah memiliki sarana pendukung e-tiket, seperti lounge e-ticketing dan vending/finding machine. Namun, sarana tersebut belum membentuk sistem e-tiket terintegrasi terminal, sehingga masih berfungsi sebagai layanan per operator”.⁵⁴



Figure 4. 1 Ticket Lounge at Bungurasih Terminal

However, all of these facilities still operate separately under each operator and have not yet been integrated into a unified terminal system. As a result, passengers using different bus services must also follow different

⁵⁴ Bambang Hermanto, Kepala Terminal Bungurasih, Wawancara (Surabaya, 4 Maret 2026)

systems. This condition causes the existing digital services to remain inconsistent.

According to Soerjono Soekanto, in order to achieve legal effectiveness, insufficient facilities must be improved and non-functioning facilities must be repaired. In this context, the terminal needs to develop a centralized e-ticketing system that connects all operators within a single integrated platform.⁵⁵

Another obstacle that also needs attention is the lack of readiness of digital infrastructure in economy-class buses. Government-funded buses such as Trans Jatim and Suroboyo Bus were indeed designed with digital systems from the beginning. However, economy-class buses are generally managed by private operators with limited capital, thereby limiting their ability to invest in digital systems.

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⁵⁵ Soerjono Soekanto, "Efektivitas Hukum dan Penerapan Sanksi" (Bandung: CV. Ramadja Karya, 1988): 80.

⁵⁶ Suratno, et al., "Kajian Tingkat Efektivitas Penggunaan E-Ticketing Oleh Penumpang Batik Solo Trans Di Surakarta Dan Sekitarnya," *Jurnal Bumi Indonesia* 2, no. 3 (2013): 4

4. Community Factors

The fourth factor is the community itself, namely the extent to which passengers as service users understand and are willing to comply with the existing regulations. In the implementation of e-ticketing, public readiness is a highly determining factor. No matter how advanced the system may be, it will have little impact if the users do not understand or are unwilling to use it.

Based on the results of interviews and field observations, it is evident that the level of public readiness at Bungurasih Terminal varies significantly. Passengers of city bus services such as Suroboyo Bus, Wira-Wiri, and Trans Jatim are already quite accustomed to digital tickets because these services were originally designed without manual ticketing systems. Likewise, passengers of intercity and interprovincial buses (AKAP) who purchase tickets through applications are generally familiar with the e-ticketing system.

This situation differs from economy-class bus passengers, particularly elderly passengers and those who are less familiar with technology. They tend to prefer purchasing tickets directly at ticket counters because it is considered easier and does not require special skills. This condition is further aggravated by the continued reliance of some passengers on ticket brokers, as their services are perceived to be more practical and less complicated.

“Yang sudah menerapkan e-ticket di terminal Bungurasih kebanyakan bus Trans dan pemkot ataupun pemerintah provinsi

*seperti Trans Jatim, Suroboyo Bus, Wara-Wiri, Mayapada. Untuk bus kelas ekonomi masih banyak yang belum menggunakan e-ticket dengan alasan perusahaannya belum menerapkan e-ticket, pasar-pasarannya kebanyakan masih pada orang-orang yang kurang paham teknologi, seperti ibu-ibu yang berumur ingin pergi ke suatu tempat dan belum paham terhadap digital”.*⁵⁷

The gap in technological ability between one group of passengers and another is often referred to as the digital divide.⁵⁸ Not everyone has equal access to technology, and not everyone possesses the same ability to use it.

This condition can be observed from direct interviews conducted with several passengers at Bungurasih Terminal, which illustrate the diversity of public attitudes and abilities in using the e-ticketing system.

One of the passengers interviewed by the author was a 25-year-old female passenger encountered in the e-ticketing lounge area. She stated that the e-ticketing system is far more beneficial because it allows ticket reservations to be made from anywhere without the need to come directly to the terminal. Price transparency also became one of her main considerations in choosing e-ticketing over conventional ticket purchasing methods.

*“Saya selalu beli tiket lewat aplikasi, lebih praktis. Tidak perlu datang ke terminal dulu, bisa pesan dari rumah atau dari kantor. Harga juga sudah jelas, tidak perlu khawatir kena tipu calo lagi. Kalau harus kelokrt kadang tidak ada waktunya”.*⁵⁹

This indicates that passengers within the productive age group who are already familiar with digital technology perceive e-ticketing as a more efficient and transparent solution.

⁵⁷ Bambang Hermanto, Kepala Terminal Bungurasih, Wawancara (Surabaya, 4 Maret 2026)

⁵⁸ Lailatul Usriya et al., “Digital divide (kesenjangan digital) dalam dunia pendidikan Islam,” in *Seminar Pendidikan Agama Islam*, vol. 2, 2023, 87–96.

⁵⁹ Amanda Aprilia, Wawancara, (Surabaya, 4 Maret 2026)

In contrast, an elderly woman stated that she did not understand how to use the e-ticketing system and did not want to be burdened by what she considered to be an overly complicated system. She firmly expressed that she felt more comfortable purchasing tickets directly at the ticket counter because the process was simpler and did not require any technological knowledge.

“Saya tidak ngerti pakai e-ticket, ribet. Mending langsung ke loket saja, sudah biasa, tidak perlu pusing-pusing”.⁶⁰

This indicates that a lack of understanding of digital technology constitutes a real obstacle for elderly groups in adopting the e-ticketing system, causing them to continue relying on conventional systems that are considered more practical and less burdensome.

In this regard, socialization becomes an important concern. Based on the data obtained, official socialization regarding e-ticketing was only first conducted on January 29, 2026, through the terminal’s Instagram social media account, which can be considered significantly delayed. Soerjono Soekanto emphasizes that legal socialization is an important part of the community factor because if people do not understand the contents and objectives of a regulation, they will not comply with it voluntarily.⁶¹

⁶⁰ Rosmiati, Wawancara, (Surabaya, 4 Maret 2026)

⁶¹ Soekanto, *Faktor Faktor yang Mempengaruhi Penegakan Hukum*.

TRAYEK	PO	OTA
YOGYAKARTA	SUGENG BHAYU	EASYBOOK, REDBUS
	EKA	easybook.com, TRAVELOKA, REDBUS
	WEDJ ISTAR	EASYBOOK, TRAVELOKA
	NASAPAN BAYA	
	SARENGAN	
	EKA	easybook.com, TRAVELOKA
	SUGENG BHAYU	EASYBOOK
	SNAR BAYA	TRAVELOKA
	EKA	easybook.com, TRAVELOKA
	SUGENG BHAYU	EASYBOOK
	NTSANG	TRAVELOKA, REDBUS
	ANGKSA TRINS	EASYBOOK
	BALI TRANS	EASYBOOK, TRAVELOKA, REDBUS
	QURUNG HARTA	EASYBOOK, TRAVELOKA, REDBUS
	REDU MULYA	EASYBOOK
	SARWONADI	EASYBOOK, TRAVELOKA, REDBUS
	SETARAN	EASYBOOK, REDBUS
	TARA MAS	EASYBOOK
	TITAN MAS	EASYBOOK
	MICHAEL MAS	TRAVELOKA, REDBUS
	WISATA HOLIDAY	REDBUS
	WISATA BONDORO	REDBUS
	27 TRANS	REDBUS

TRAYEK	PO	OTA
AMBAR, BONDOWOSO, SANYUNANG	AKAS MILA SELAJITERA	EASYBOOK
	MILA SELAJITERA	EASYBOOK
	TIBTO DIM	EASYBOOK, REDBUS
	DANA DMASH	EASYBOOK
	SAFANA	EASYBOOK
	KALISARI	EASYBOOK, TRAVELOKA
	LAKSANA ANDA	EASYBOOK
	RESTU	TRAVELOKA
	BAGONG	EASYBOOK
	TENTREM	EASYBOOK, TRAVELOKA, REDBUS
	BONDORO INDAH	EASYBOOK, REDBUS
	NEO HARAPAN UTAMA	EASYBOOK
	RESTU PANDA	TRAVELOKA
	KALISARI	REDBUS
	AKAS MILA SELAJITERA	EASYBOOK
	MILA SELAJITERA	EASYBOOK
	AMBUKU	MILA SELAJITERA

Figure 4. 2 Socialization Through Social Media

Cahyadi (2025), in his research on the electronic ticketing system of Trans Metro Pekanbaru, found a similar issue: inadequate socialization and the lack of direct assistance for passengers became the main causes of the low level of e-ticketing usage.⁶²

5. Cultural Factors

The fifth factor is culture. According to Soerjono Soekanto, culture in this context does not merely refer to traditions or customs, but also includes the values and habits that shape how society responds to a regulation. Culture plays an important role in determining whether society is willing to support or instead avoid a particular policy.

In the implementation of e-ticketing at Bungurasih Terminal, cultural factors can be observed in two aspects. First, there is the long-standing habit of purchasing tickets at manual ticket counters, which has

⁶² Cahyadi, "Implementasi Peraturan Walikota Pekanbaru Nomor 26 Tahun 2019 Tentang Pedoman Penyelenggaraan Tiket Elektronik Pada Angkutan Massal Trans Metro Pekanbaru."

existed for decades. The transition from old habits to a new system cannot occur instantly; it requires a fairly long adjustment process.

Based on the results of an interview, one passenger at Bungurasih Terminal stated that he was able to use the e-ticketing system and considered it not too difficult to operate. However, in practice, he still more frequently purchased tickets at conventional ticket counters because he had been accustomed to doing so for a long time and felt more confident holding a physical ticket directly in his possession.

*“Sebetulnya saya bisa pakai e-ticket, tidak susah. Tapi tetap lebih sering beli di loket, sudah terbiasa. Lebih tenang kalau langsung ke loketnya, ada tiket fisiknya, lebih percaya. Kalau digital masih agak was-was, takut ada gangguan sistem pas mau berangkat.”*⁶³

This indicates that there are other obstacles in the implementation of e-ticketing, namely the factors of habit and trust in digital systems.

Second, there is the long-standing culture of dependence on ticket brokers that has become deeply rooted in the terminal environment. Although such practices are not permitted by regulation, ticket brokers continue to exist because some passengers feel assisted by their presence. However, based on the statements of the informants, since the implementation of e-ticketing began, the practice of ticket brokering has gradually decreased.

⁶³ Syifa Andriani, Wawancara, (Surabaya, 4 Maret 2026)

“Dari sistem penerapan e-ticket ini calo sedikit berkurang, tidak sebanyak sebelum adanya e-ticket.”⁶⁴

The decline in ticket brokering practices is a very tangible positive impact that deserves appreciation. For a long time, the presence of ticket brokers disadvantaged passengers because ticket prices became unclear and unofficial. With the implementation of e-ticketing, transactions occur directly between passengers and operators, leaving no room for ticket brokers to operate.

Cultural change indeed requires a considerable amount of time. Habits that have been formed over decades cannot be changed through a single policy alone. However, the positive signs that have begun to emerge indicate that such changes are possible, provided that the policy is implemented consistently and continuously.⁶⁵

C. Implementation of Electronic Ticketing at Bungurasih Terminal from a Smart City Perspective

Smart City is a concept of urban management that integrates Information and Communication Technology (ICT) into the governance and operation of public services systematically, with the aim of improving efficiency, enhancing service quality, and increasing the welfare of city residents. This integration is made possible through the existence of the Internet of Things (IoT), namely a network of electronic devices that are interconnected

⁶⁴ Bambang Hermanto, Kepala Terminal Bungurasih, Wawancara (Surabaya, 4 Maret 2026)

⁶⁵ Laurensius Arliman, *Penegakan hukum dan kesadaran masyarakat* (Deepublish, 2015).

and capable of transmitting and processing data automatically without excessive human intervention.⁶⁶ From a legal perspective, the development of Smart City in Indonesia has a strong normative foundation through Law Number 23 of 2014 concerning Regional Government, particularly Article 386, which emphasizes that regional innovation includes the application of science and technology in the administration of government. The principles of such regional innovation include increasing efficiency, improving service quality, promoting transparency, and prioritizing accountable public interests.

However, the implementation of the Smart City concept in Indonesia does not proceed without obstacles. Various structural challenges are frequently encountered, ranging from uneven digital infrastructure, varying levels of readiness among regional government officials, to the limited digital literacy of the public in utilizing technology optimally. These conditions make Smart City an ideal that is relatively easy to formulate in policy but highly challenging to implement in practice, particularly in areas that serve heterogeneous segments of society such as Bungurasih Terminal.

In both academic literature and industrial practice, IBM has developed the Smart City concept through the IBM Smart Planet program with the vision of interconnection, instrumentation, and intelligence. IBM divides the Smart City concept into six main dimensions, namely smart economy, smart mobility, smart governance, smart people, smart living, and smart environment.⁶⁷ Among

⁶⁶ Farhad Najib Izzuddin, "Konsep smart city dalam pembangunan berkelanjutan," *Citizen: Jurnal Ilmiah Multidisiplin Indonesia* 2, no. 3 (2022): 376–82.

⁶⁷ Anggraeni Widya Purwita et al., *Smart city: Konsep dasar dalam penerapan sistem perkotaan berkelanjutan* (PT. Sonpedia Publishing Indonesia, 2025).

these six dimensions, the dimensions most directly relevant to the implementation of e-ticketing at Bungurasih Terminal are smart mobility and smart governance. Smart mobility focuses on transportation systems that are efficient, integrated, and technology-based so that problems such as traffic congestion, ticket brokering practices, and disorder in passenger management can be minimized. Meanwhile, smart governance focuses on transparent, accountable, and responsive governance through the utilization of digital data in decision-making processes.

The e-ticketing system at the terminal directly relates to both of these dimensions. From the perspective of smart mobility, the implementation of e-ticketing enables passenger data to be managed in real time, transactions to occur transparently without intermediaries, queues to become more orderly, and fleet scheduling management to be carried out based on accurate data. From the perspective of smart governance, ticket digitalization creates transaction records that can be audited, reduces the potential for revenue leakage from ticket sales, and provides a useful database for long-term transportation policy planning. In other words, e-ticketing is not merely a change in payment methods, but rather a data infrastructure that forms the foundation of terminal governance based on the Smart City concept.

The City of Surabaya itself has positioned itself as one of the pioneers of the Smart City concept in Indonesia since receiving the Smart City Award in 2011. Various digital innovations have been implemented consistently, ranging from e-government systems, application-based complaint services, and

integrated CCTV cameras, to the implementation of electronic traffic ticketing systems. In the transportation sector, this commitment has been realized through the operation of Suroboyo Bus, which was designed from the outset based on a digital system, followed by Trans Jatim and Wira-Wiri. Mayor Regulation Number 22 of 2023 represents a continuation of this commitment, namely an effort to expand the digital transportation ecosystem to all modes operating at Bungurasih Terminal, including intercity and interprovincial buses (AKAP) and economy-class buses.

Based on the results of field research conducted through direct observation and in-depth interviews, the current implementation of e-ticketing at Bungurasih Terminal has not yet fully met the standards of smart mobility. There are three groups of services with significantly different levels of digitalization.

The first group consists of services that are already fully digital, namely Suroboyo Bus, Trans Jatim, Wira-Wiri, and Mayapada. These services were originally designed to operate without manual ticketing mechanisms. Passengers purchase tickets through the GoBis application or by using electronic cards, allowing all passenger movement data to be digitally recorded. Within this group, the indicators of smart mobility have been fulfilled: there is no room for ticket brokering practices, prices are transparent, and passenger orderliness is maintained.

The second group consists of the majority of intercity and interprovincial bus operators (AKAP) and some intercity buses within the

province (AKDP), which already provide online ticket purchasing services through third-party platforms such as Traveloka and RedBus. There is also one vending machine unit in the lounge area that facilitates online ticket purchases for a particular bus operator. Within this group, digitalization has been partially implemented, but it has not yet been consolidated into a single platform managed by the terminal.

The third group, which constitutes the greatest obstacle, is economy class buses that still rely entirely on manual ticket counters. This segment actually serves a large number of passengers, particularly lower-middle-class communities and elderly groups whose daily mobility is highly dependent on economy-class buses. As long as this group remains untouched by digitalization, Bungurasih Terminal cannot be considered a smart mobility based terminal in a substantive sense.

The statements above confirm that the most fundamental issue is not the absence of e-ticketing at the terminal, but rather the absence of a centralized e-ticketing system that integrates all operators into a single platform institutionally managed by the terminal. At present, each service operates with a separate system: Suroboyo Bus has its own system, AKAP operators use third-party platforms, and economy-class buses do not have any digital system at all. This condition directly contradicts the principle of interconnection that forms the core vision of IBM Smart Planet, in which all components within the urban ecosystem should be connected within one integrated data network.

Without system integration, passenger data, which should become the primary asset of smart mobility, cannot be utilized optimally. The terminal does not possess a real-time overview regarding how many passengers depart, where their destinations are, which transportation modes are used most frequently, and where operational congestion points occur. In fact, such data constitute the foundation of intelligent and responsive terminal governance, which is the essence of the smart governance dimension within the framework of the Smart City concept.

Based on the overall analysis above, it can be concluded that the implementation of Mayor Regulation Number 22 of 2023 in supporting the Smart City concept in the City of Surabaya has only been partially effective. Viewed from the six dimensions of Smart City developed by IBM, the smart mobility dimension has only been fulfilled in certain services, while the smart governance dimension, particularly in terms of integrated passenger data management, has not been realized at all due to the absence of a centralized e-ticketing platform at the terminal level.

This ineffectiveness does not stem from weaknesses in the substance of the Mayor Regulation itself, because juridically the regulation is valid and well-structured, but rather from three interrelated root problems: first, the absence of a technical regulation from the Ministry of Transportation specifically requiring e-ticketing in Type A terminals; second, the unavailability of a centralized e-ticketing platform integrating all operators; and third, delayed

socialization efforts that have not effectively reached digitally vulnerable groups.

The plan to establish a centralized ticket counter currently being prepared by the terminal management is an appropriate and strategic step. However, its success requires regulatory synchronization between the Government of the City of Surabaya and the Ministry of Transportation, accompanied by the commitment of all stakeholders to make smart mobility a terminal service standard rather than merely an option for operators that are already prepared. (sampai sini kurang footnote)

D. The Implementation of Electronic-Tickets at Bungurasih Terminal from the Perspective of Mashlahah

1. The Position of Mashlahah as a Framework for Public Policy Analysis

In Islamic law, *maslahah* is one of the most fundamental methodological instruments in the process of *istinbat al-hukm* (legal determination). Etymologically, *maslahah* is derived from the word *as-shalah*, which means goodness, benefit, and the integrity of a state.⁶⁸ Scholars of *ushul fiqh* define it as an effort to bring about benefit (*jalb al-manfa'ah*) while simultaneously averting harm (*dar'u al-mafsadah*) for human life, both in this world and the hereafter. Imam al-Ghazali emphasized that *maslahah* is essentially the preservation of the objectives of the Sharia (*maqashid al-syari'ah*), which include the protection of religion

⁶⁸ H Amir Syarifudin, *Ushul Fiqih Jilid II*, vol. 2 (Prenada Media, 2014).

(hifz al-din), life (hifz al-nafs), intellect (hifz al-aql), lineage (hifz al-nasl), and property (hifz al-mal). These five aspects serve as the primary benchmarks for determining whether an action or policy possesses value as a *maslahah* or, conversely, leads to *mafsadah* (harm).⁶⁹

In the context of public policy, the concept of *maslahah* is not limited solely to the realm of *ibadah* (worship); it is also relevantly applied to policies concerning *muamalah* (social transactions), governance, and public services. From an Islamic perspective, a policy is not deemed "good" simply because it is procedurally valid or legal-formal; rather, it must substantively deliver tangible benefits to the community.⁷⁰ Consequently, the theory of *maslahah* serves as an appropriate analytical tool to evaluate the effectiveness of Surabaya Mayoral Regulation Number 22 of 2023 regarding the e-ticketing system at Bungurasih Terminal. This evaluation considers not only its legal validity but also the extent to which the policy realizes concrete welfare that can be directly experienced by public transportation users.

a. *Mashlahah* Based on Its Strength and Level of Urgency

Imam al-Ghazali classifies *maslahah* into three levels based on their scale of priority and degree of importance to human life:

1) *Al-Mashlahah al-Daruriyyah*

⁶⁹ Zainal Azwar, "Pemikiran Ushul Fikih Al-Ghazâlî Tentang Al-Maslahah Al-Mursalah (Studi Eksplorasi Terhadap Kitab Al-Mustashfâ Min 'Ilmi Al-Ushûl Karya Al-Ghazâlî)," *FITRAH: Jurnal Kajian Ilmu-ilmu Keislaman* 1, no. 1 (2016): 47–70, <https://doi.org/10.24952/fitrah.v1i1.327>.

⁷⁰ Widya Rahmat dan Luci Afiani Oktavia, "Urgensi Administrasi Publik Dalam Islam : Tinjauan Maslahah Mursalah," *Jurnal Hadratul Madaniyah* 11, no. 1 SE-Articles (18 Juli 2024): 62–68, <https://doi.org/10.33084/jhm.v11i1.7578>.

These are interests whose existence is absolute and most fundamental to human life. *Daruriyyah* represents the highest level of *maslahah*, as it concerns the preservation of five basic elements without which human life—both individually and socially—cannot function properly. These five elements are the preservation of religion (*hifz al-din*), the preservation of life (*hifz al-nafs*), the preservation of intellect (*hifz al-aql*), the preservation of lineage (*hifz al-nasl*), and the preservation of property (*hifz al-mal*).⁷¹

2) *Al-Mashlahah al-Hajiyyah*

These are interests positioned one level below *daruriyyah*; their absence does not cause fundamental destruction (*fasad*) to human life, but it does lead to difficulty, hardship, and inconvenience.

Al-Ghazali explains that the primary function of *hajiyyah* is to eliminate hardship and provide ease (*raf' al-haraj*) for humans to live their lives properly.⁷² Examples include the permissibility of shortening prayers (*qasr*) and breaking the fast for travelers and the sick, as well as in the field of *muamalah* through the permissibility of *salam* (forward sales) and *ijarah* (leasing/hiring) contracts, which facilitate ease in transactions. In essence, *hajiyyah* serves as a

⁷¹ Dwi Dasa Suryantoro, “Maslahah Dharuriyyah Pemikiran Imam Al-Ghazali Dan Kedudukannya Dalam Hukum Keluarga Islam,” *Imanu: Jurnal Hukum dan Peradaban Islam* 2, no. 01 (18 Februari 2026): 88–104, <https://risetkendikia.com/index.php/jurnal-imanu/article/view/234>.

⁷² Fahrudin Ali Sabri, “Konsep Raf’ Al-Haraj Dalam Perspektif Ushul Fiqih,” *AL-IHKAM: Jurnal Hukum & Pranata Sosial* 9, no. 1 (2014): 1–21.

complement (*mukammil*) to *daruriyyah*, in the sense that its presence ensures that the implementation of *daruriyyah* proceeds more easily, orderly, and optimally.

3) *Al-Mashlahah al-Tahsiniyyah*

These are interests positioned at the lowest level. *Mashlahah tahsiniyyah* involves the adoption of all that is fitting and appropriate as sanctioned by good customs and encompassed within *mahasin al-akhlaq* (noble character). This interest refers more to aesthetics and perfection. If *tahsiniyyah* is not fulfilled, human life continues to function normally as it should, as what is diminished is merely the complementary beauty and refinement. Examples in the realm of *ibadah* (worship) include drawing closer to Allah through voluntary deeds, such as *sunnah* prayers, *sunnah* fasting, and giving alms. In the realm of *adat* (customs), examples include maintaining etiquette in eating and drinking and choosing wholesome food. Thus, these three levels of *mashlahah* do not hold equal standing; in the event of a conflict of interest, *daruriyyah* always takes precedence over *hajiyyah* and *tahsiniyyah*, while *hajiyyah* takes precedence over *tahsiniyyah*.⁷³

2. The Position of E-Ticketing within the Smart City Concept: A Mashlahah Perspective

⁷³ Hirmayadi Saputra, Lalu Yoga Vandita, dan Supriyadi, "Studi Analisis Kedudukan Masalah Mursalah Sebagai Salah Satu Sumber Hukum Islam," *RIBHUNA: Jurnal Keuangan dan Perbankan Syariah* 2 (2023).

The electronic-ticket (e-ticket) system is one of the primary instruments supporting the Smart City concept in the field of public transportation, specifically within the dimension of smart mobility. As a policy arising from Surabaya Mayoral Regulation Number 22 of 2023, the implementation of e-tickets at Bungurasih Terminal can be evaluated not only based on legal effectiveness alone but also by measuring the extent to which it delivers tangible *mashlahah* (welfare) to the community. From a *mashlahah* perspective, a public policy is deemed "good" not merely because it is procedurally valid, but because it is substantively capable of bringing benefits and averting harm (*mudharat*) for the life of the society.

When reviewed through the classification of *mashlahah* based on its level of urgency, the implementation of e-tickets within the Smart City framework at Bungurasih Terminal is most appropriately categorized as *mashlahah hajiyyah*. This is based on a primary parameter that distinguishes *hajiyyah* from *daruriyyah* and *tahsiniyyah*, namely the parameter of *raf' al-ḥaraj* (the elimination of hardship). This parameter states that a benefit is *hajiyyah* in nature if its absence does not lead to fundamental destruction in life, yet causes tangible difficulty, distress, and discomfort for the community.⁷⁴

The parameter of *raf' al-ḥaraj* is concretely met in the case of e-ticketing at Bungurasih Terminal. From a *daruriyyah* standpoint, the e-ticket

⁷⁴ Afridawati Afridawati, "Stratifikasi Al-Maqashid Al-Khamsah (Agama, Jiwa, Akal, Keturunan Dan Harta) Dan Penerapannya Dalam Masalahah," *Al-Qisthu: Jurnal Kajian Ilmu-Ilmu Hukum* 13, no. 1 SE-Articles (20 Februari 2022): 15–30, <https://doi.org/10.32694/qst.v13i1.1211>.

system cannot be categorized into this level because, even without its existence, public transportation activities can still proceed as evidenced by the ongoing conventional operation of economy-class buses without fundamental disruption. This indicates that e-tickets are not an absolute necessity whose absence would result in the destruction or fundamental collapse of the social order.

Nevertheless, the absence of e-tickets has proven to cause several tangible difficulties directly felt by public transportation users. First, the long-standing practice of "scalping" (*percaloan*) at Bungurasih Terminal forces passengers to pay for tickets above the official government-regulated prices, resulting in transactional injustice that financially harms the community. Second, the lack of transparency regarding price certainty and ticket availability hinders passengers' travel planning, particularly for those requiring certainty in schedules and costs. Third, the disorder in queues and manual passenger management creates discomfort and potential conflict within the terminal area. These difficulties are what Islamic jurisprudence terminology refers to as *ḥaraj wa masyaqqah* namely, burdens and constraints that directly characterize *mashlahah hajiyyah*.

Consequently, within the Smart City framework at Bungurasih Terminal, the e-ticket serves as a complement (*mukammil*) to fulfill the community's transportation needs. Its presence ensures that transportation services proceed in a manner that is easier, more orderly, transparent, and protected from harmful practices. This is the essence of *mashlahah hajiyyah*

as intended in the theory of *mashlahah*: a benefit that is not absolute fundamental in nature, yet its existence is highly necessary so that human life may proceed properly, comfortably, and free from difficulties that should rightfully be prevented.

CHAPTER V

CONCLUSION

A. Conclusion

1. The implementation of Surabaya Mayoral Regulation Number 22 of 2023 concerning electronic-tickets (e-tickets) at Bungurasih Terminal in support of the Smart City concept in Surabaya has not yet been fully effective. Based on an analysis using Soerjono Soekanto's theory of legal effectiveness, issues exist across nearly all determining factors. Regarding the legal factor, while this regulation is juridically valid and possesses good substantive quality, it faces jurisdictional constraints because Bungurasih Terminal is managed by the Class II Land Transportation Management Center (BPTD) of East Java under the Ministry of Transportation, rather than being directly under the Surabaya City Government. In terms of law enforcement, there are currently no firm sanctions for operators who fail to implement e-tickets. Regarding facilities and infrastructure, the available e-ticketing infrastructure is not yet integrated into a centralized platform and still operates independently per operator. From the social factor, the digital divide remains evident, particularly among economy-class bus passengers who are largely unfamiliar with the technology; this is compounded by official socialization that only commenced in January 2026, which is considered significantly delayed. Furthermore, regarding the cultural factor, the long-standing habit of cash transactions and reliance on "scalping" (calo) services for decades remains difficult to change in a short time, although

positive signs of change are emerging with the reduction of scalping practices since e-tickets were implemented. Viewed from a Smart City perspective, the implementation of e-tickets at Bungurasih Terminal only partially fulfills the dimension of smart mobility and has yet to fully realize the dimension of smart governance. This is due to the absence of a centralized e-ticketing platform that integrates all operators within a single terminal system. Three service groups show varying levels of digitalization: the Suroboyo Bus, Trans Jatim, Wira-Wiri, and Mayapada services are fully digital; most Inter-City Inter-Province (AKAP) operators provide online ticket purchases through third-party platforms; meanwhile, economy-class buses still operate entirely conventionally. This ineffectiveness stems from three interconnected root causes: the lack of technical regulations from the Ministry of Transportation specifically mandating e-tickets at Type A Terminals, the unavailability of a centralized e-ticketing platform integrating all operators, and delayed socialization that has not effectively reached digitally vulnerable groups.

2. The implementation of electronic-tickets (e-tickets) at Bungurasih Terminal from the perspective of *mashlahah* is categorized as *mashlahah hajiyyah*, a benefit whose existence is not absolute fundamental, yet is highly necessary to eliminate hardship (*raf' al-haraj*) experienced by the public in using transportation services. Without e-tickets, transportation activities can indeed still function, as evidenced by the conventional operation of economy-class buses; thus, the e-ticket system cannot be categorized as

daruriyyah. Nevertheless, its absence has proven to cause tangible difficulties, namely "scalping" practices that harm passengers financially, uncertainty regarding prices and ticket availability, and disorder in passenger management within the terminal area. These difficulties are categorized as *ḥaraj* and *masyaqqah* burdensome and constraining conditions that serve as the primary characteristics of *mashlahah ḥājiyyah*. However, this benefit has not yet been enjoyed comprehensively (*mashlahah al-'ammah*), given that e-ticketing is still limited to Suroboyo Bus, Trans Jatim, Wira-Wiri, and certain Inter-City Inter-Province (AKAP) services, while economy-class buses still operate entirely conventionally. Therefore, expanding the scope of e-ticket implementation, accompanied by the strengthening of regulations and support from all stakeholders, is an urgent step to ensure this policy truly realizes a benefit that is fair, equitable, and dignified for all public transportation users at Bungurasih Terminal.

B. Recommendation

1. For the Ministry of Transportation and the Class II Land Transportation Management Center (BPTD) of East Java, it is necessary to immediately issue technical regulations at the central government level specifically mandating the implementation of e-ticketing systems in Type A Terminals, including Bungurasih Terminal. These regulations should incorporate minimum digital infrastructure standards and clear sanction mechanisms for operators that fail to fulfill these obligations. Furthermore, the Class II Land Transportation Management Center (BPTD) of East Java needs to develop

a centralized e-ticketing system that integrates all operators into a single terminal platform, ensuring that passengers do not have to switch between different systems simply because they are using different bus companies (PO). Synchronization of regulations between the Ministry of Transportation and the Surabaya City Government must also be strengthened so that existing e-ticketing policies can be comprehensively implemented without jurisdictional barriers.

2. For the Management of Bungurasih Terminal (Class II Land Transportation Management Center of East Java), The plan to develop a centralized ticket counter, which is currently being prepared, must be realized immediately and utilized as momentum for a comprehensive digital transformation of the terminal. The terminal management must ensure that the centralized system employs an e-ticketing platform accessible to all operators, including economy-class buses. Furthermore, it is necessary to enhance the capacity of field officers to provide direct assistance to passengers who are not yet familiar with using digital systems. Socialization must also be carried out more massively, structurally, and sustainably not only through social media but also via banners in terminal areas, verbal announcements, and direct assistance from officers to passengers in need.
3. For Future Researchers, Digital transformation in the public transportation sector is a continuously evolving issue that has yet to be fully mapped academically, leaving it wide open for further research from various perspectives. Future researchers may critically examine how transportation

digitalization policies interact with existing social, economic, and legal dynamics in society, including their implications for equitable access to public services. Comparative studies across different regions or countries are also highly relevant to generate more mature and evidence-based policy recommendations. Thus, research in this field is not only of academic value but can also provide a tangible contribution to the formulation of more inclusive and equitable public transportation policies in the future.

REFERENCES

BOOK

- Abubakar, H Rifa'i. *Pengantar metodologi penelitian*. SUKA-Press UIN Sunan Kalijaga, 2021.
- Ali, Zainuddin. *Metode penelitian hukum*. Sinar Grafika, 2021.
- Arliman, Laurensius. *Penegakan hukum dan kesadaran masyarakat*. Deepublish, 2015.
- Huda, Muhammad Chairul, dan M H S HI. *Metode Penelitian Hukum (Pendekatan Yuridis Sosiologis)*. The Mahfud Ridwan Institute, 2021.
- Khamaludin, Khamaludin, Filda Angellia, Samuel Aleksander Mandowen, Vina Septiana Windyasari, Arif Mudi Priyatno, Halomoan Edy Manurung, Yuniansyah Yuniansyah, Affrida Amalia, Rudhi Wahyudi Febrianto, dan Loso Judijanto. *SMART CITY: Teori dan Penerapan*. PT. Sonpedia Publishing Indonesia, 2024.
- Latip, Abdul. *Ushul Fiqih dan Kaedah Ekonomi Syariah*. Merdeka Kreasi Group, 2022.
- Muhaimin. *Metode Penelitian Hukum*. Mataram: Mataram University Press, 2020.
- Prastowo, Andi. "Metode penelitian kualitatif dalam perspektif rancangan penelitian," 2012.
- Purwita, Anggraeni Widya, Rustiyana Rustiyana, Loso Judijanto, Ellen Tantrisna, Malisye Christin Sjoen, Fadhly Abdillah, Achmad Agus Salim, dan Jeanne Noveline Tedja. *Smart city: Konsep dasar dalam penerapan sistem perkotaan berkelanjutan*. PT. Sonpedia Publishing Indonesia, 2025.
- Ridwan, Ridwan. "Metode penelitian." Yayasan Sahabat Alam Rafflesia, 2024.
- Soekanto, Soerjono. "Efektivitas hukum dan penerapan sanksi." *Bandung: CV. Ramadja Karya* 80 (1988).
- . *Faktor Faktor yang Mempengaruhi Penegakan Hukum*. Depok: Rajawali Press, 2022.
- Supriyadi, Dedi. *Konsep Smart City Dalam Pembangunan Kota di Indonesia*. Jakarta: Pustaka Ceria, 2018.

Suyanto, S H. *Metode Penelitian Hukum Pengantar Penelitian Normatif, Empiris Dan Gabungan*. Unigres Press, 2023.

Syarifudin, H Amir. *Ushul Fiqih Jilid II*. Vol. 2. Prenada Media, 2014.

ARTICLE

Afridawati, Afridawati. “STRATIFIKASI AL-MAQASHID AL-KHAMSAH (Agama, Jiwa, Akal, Keturunan dan Harta) DAN PENERAPANNYA DALAM MASLAHAH.” *Al-Qisthu: Jurnal Kajian Ilmu-Ilmu Hukum* 13, no. 1 SE-Articles (20 Februari 2022): 15–30. <https://doi.org/10.32694/qst.v13i1.1211>.

Ardi, Sahibul. “Konsep Masalah Dalam Perspektif Ushuliyyin.” *An-Nahdhah| Jurnal Ilmiah Keagamaan Dan Kemasyarakatan* 10, no. 2 (2017): 233–58.

Arifin, Muhamad Ari. “STUDI ANALISIS KEDUDUKAN MASLAHAH MURSALAH SEBAGAI SALAH SATU SUMBER HUKUM ISLAM: STUDI ANALISIS KEDUDUKAN MASLAHAH MURSALAH SEBAGAI SALAH SATU SUMBER HUKUM ISLAM.” *RIBHUNA: Jurnal Keuangan dan Perbankan Syariah* 2, no. 2 (2023): 74–84.

Asy’ari, Rifaki. “Mashlahah dalam Maqasid Syari’ah.” *Ta’wiluna: Jurnal Ilmu Al-Qur’an, Tafsir dan Pemikiran Islam*, 2022.

Azwar, Zainal. “Pemikiran Ushul Fikih Al-Ghazâlî Tentang Al-Maslahah Al-Mursalah (Studi Eksplorasi Terhadap Kitab Al-Mustashfâ Min ‘Ilmi Al-Ushûl Karya Al-Ghazâlî).” *FITRAH: Jurnal Kajian Ilmu-ilmu Keislaman* 1, no. 1 (2016): 47–70. <https://doi.org/10.24952/fitrah.v1i1.327>.

Benuf, Kornelius, dan Muhamad Azhar. “Metodologi Penelitian Hukum sebagai Instrumen Mengurai Permasalahan Hukum Kontemporer.” *Gema Keadilan; Vol 7, No 1 (2020)*, 1 April 2020. <https://doi.org/10.14710/gk.2020.7504>.

Cahyadi, Muhammad Hendra. “IMPLEMENTASI PERATURAN WALIKOTA PEKANBARU NOMOR 26 TAHUN 2019 TENTANG PEDOMAN PENYELENGGARAAN TIKET ELEKTRONIK PADA ANGKUTAN MASSAL TRANS METRO PEKANBARU.” *JIANA (Jurnal Ilmu*

- Administrasi Negara*) 23, no. 2 SE-Articles (31 Agustus 2025): 205–16.
<https://doi.org/10.46730/jiana.v23i2.8296>.
- Dharmawan, Widya, Greace Inri Apulina Br Sinulingga, Syafiril Ajmal Yanotama, Audhi Laksa Amanda Sasmito, dan Singgih Manggalau. “Implementasi Smart Mobility Bus Trans Semanggi Suroboyo Sebagai Bentuk Efisiensi Tata kelola Transportasi Publik.” *VISA: Journal of Vision and Ideas* 4, no. 3 SE-Articles (21 Agustus 2024): 1372 – 1384. <https://doi.org/10.47467/visa.v4i3.2882>.
- Djaenab, Djaenab. “Efektifitas dan berfungsinya hukum dalam masyarakat.” *Ash-Shahabah: Jurnal Pendidikan Dan Studi Islam* 4, no. 2 (2018): 148–53.
- Hamdi, Bahrul. “KONSEP IMPLEMENTASI MASHLAHAH MENURUT AL-GHAZALI, ASY-SYATIBI DAN NAJMUDDIN AT-THUFI (Studi Komparatif Analitis Pemikiran Hukum Islam).” *Al-Hurriyah: Jurnal Hukum Islam* 2, no. 2 SE-Articles (5 Maret 2018): 219–31.
<https://doi.org/10.30983/alhurriyah.v2i2.402>.
- Handayani, Sabrina, Dessy Angga Afrianti, dan Mega Suryandari. “Implementasi kebijakan angkutan umum di DKI Jakarta.” *Jurnal Teknologi Transportasi Dan Logistik* 2, no. 1 (2021): 19–28.
- Hasibuan, Irfan Effendi, dan Zulham Zulham. “Analisis Hukum Ekonomi Terhadap Kebijakan Angkutan Umum di Kota Medan; Perspektif Al-Maslahah.” *Al-Muamalat Jurnal Hukum dan Ekonomi Syariah* 10, no. 1 (2025): 1–14.
<https://doi.org/10.32505/muamalat.v10i1.10659>.
- Izzuddin, Farhad Najib. “Konsep smart city dalam pembangunan berkelanjutan.” *Citizen: Jurnal Ilmiah Multidisiplin Indonesia* 2, no. 3 (2022): 376–82.
- Mahayani, Ni Made Hintya. “Evaluasi Implementasi Smart City Di Indonesia: Tantangan Teknologi Dan Keberlanjutan.” *GOVERNANCE: Jurnal Ilmiah Kajian Politik Lokal dan Pembangunan* 10, no. 4 (2024).
<https://doi.org/10.56015/gjikplp.v10i4.209>.
- Margaretha, Audrea Maria, dan Alih Aji Nugroho. “Transportasi Publik Terintegrasi: Optimalisasi Implementasi Smart Mobility di DKI Jakarta.” *Journal Of Public Policy and Applied Administration*, 2023, 47–58.
<https://doi.org/10.32834/jplan.v5i2.676>.

- Mozin, Sri Yulianty, Susanti Abdullah, dan Nadia Sawali. "Pemanfaatan Teknologi Cerdas Untuk Pelayanan Publik: Study Tentang e-Government Dan Smart City Berbasis ICT Big Data Dan AI." *JPS: Journal of Publicness Studies* 2, no. 2 (2025): 117–30.
- Novita Sari, Devi, Dia Zulfia Rahmadani, dan Mohamad Yusuf Wardani. "Implementasi Kebijakan Pemerintah Kota Surabaya Dalam Mewujudkan Inovasi Smart City." *Journal of Governance Innovation* 2, no. 2 SE-Articles (11 September 2020): 112–30. <https://doi.org/10.36636/jogiv.v2i2.435>.
- Putri, Ayuning Tyas Azis, Hidayat Andyanto, Moh Anwar, dan Anita Anita. "Perlindungan Hukum Terhadap Penumpang Angkutan Umum Yang Mengalami Tindakan Overload." *Jurnal Jendela Hukum* 10, no. 1 (2023): 36–45. <https://doi.org/10.24929/jjh.v10i1.2844>.
- Rahmat, Widya, dan Luci Afiani Oktavia. "URGENSI ADMINISTRASI PUBLIK DALAM ISLAM: TINJAUAN MASLAHAH MURSALAH." *Jurnal Hadratul Madaniyah* 11, no. 1 SE-Articles (18 Juli 2024): 62–68. <https://doi.org/10.33084/jhm.v11i1.7578>.
- Rahmatullah, Anita Ratnasari, Diah Intan Kusumo Dewi, dan Chindy Dhia Tsabit Nurmasari. "Integrasi antar transportasi umum di Kota Semarang." *Jurnal Pengembangan Kota* 10, no. 1 (2022): 36–46.
- Risal Fikri, Haikal. "Suroboyo Bus as a Case Study in Public Transportation Efficacy at City of Surabaya, East Java Indonesia." *Suroboyo Bus as a Case Study in Public Transportation Efficacy at City of Surabaya, East Java Indonesia (November 03, 2024)*, 2024.
- Sabri, Fahrudin Ali. "Konsep Raf' Al-Haraj Dalam Perspektif Ushul Fiqih." *AL-IHKAM: Jurnal Hukum & Pranata Sosial* 9, no. 1 (2014): 1–21.
- Saputra, Hirmayadi, Lalu Yoga Vandita, dan Supriyadi. "Studi Analisis Kedudukan Masalah Mursalah Sebagai Salah Satu Sumber Hukum Islam." *RIBHUNA: Jurnal Keuangan dan Perbankan Syariah* 2 (2023).
- Sulthon, Muhammad. "Mashlahah sebagai tujuan inti pembentukan hukum Islam." *Jurnal Darussalam: Jurnal Pendidikan, Komunikasi Dan Pemikiran Hukum Islam* 14, no. 2 (2023): 39–55.

<https://ejournal.iaida.ac.id/index.php/darussalam/article/view/2024/1262>.

Suratno, Veranita Yulia Manuari, dan Andri Kurniawan. “Kajian Tingkat Efektivitas Penggunaan E-Ticketing Oleh Penumpang Batik Solo Trans Di Surakarta Dan Sekitarnya.” *Jurnal Bumi Indonesia* 2, no. 3 (2013).

Suryantoro, Dwi Dasa. “MASLAHAH DHARURIYYAH PEMIKIRAN IMAM AL-GHAZALI DAN KEDUDUKANNYA DALAM HUKUM KELUARGA ISLAM.” *Imanu: Jurnal Hukum dan Peradaban Islam* 2, no. 01 (18 Februari 2026): 88–104. <https://risetkendikia.com/index.php/jurnal-imanu/article/view/234>.

Susanti, Risma Septiana Ari, dan Anita Susanti. “Rancangan Digitalisasi Tiket Angkutan Umum (Lyn) Berbasis Website Berdasarkan Jarak Perjalanan (Studi Kasus: Trayek Joyoboyo-Menganti Surabaya).” *Jurnal Media Publikasi Terapan Transportasi*, 2024, 291–302. <https://doi.org/10.26740/mitrans.v2n3.p291-302>.

INTERNET/WEBSITE

4R1F T1454. “Terminal Bungurasih Memanas: Calo Tiket Dikeroyok Usai Diduga Tipu Penumpang.” *Koran Digital Nusantara Abadi News*. 2025.

Ayu, Frisilia. “Terminal Bungurasih Sidoarjo, Terminal Terbesar di Jawa Timur.” *beritajatim.com*. 2024. <https://beritajatim.com/terminal-bungurasih-sidoarjo-terminal-terbesar-di-jawa-timur>.

Badan Pusat Statistik Kota Surabaya. “Surabaya Dalam Angka 2024.” Surabaya, 2024.

Berita Resmi Statistik. “Hasil Sensus Penduduk 2020 Kota Surabaya.” Surabaya, 2021.

Pemerintah Kota Surabaya. “Pemkot Surabaya Serahkan Terminal Tipe A ke Kementerian Perhubungan RI,” 2022. <https://www.surabaya.go.id/id/berita/65966/pemkot-surabaya-serahkan-terminal-tipe-a-purabaya-ke-kementerian-perhubungan-ri>.

- Usriya, Lailatul, M Naufal Farhan, Nadlifah Ainiyah, dan Lilik Nur Kholidah. “Digital divide (kesenjangan digital) dalam dunia pendidikan Islam.” In *Seminar Pendidikan Agama Islam*, 2:87–96, 2023.
- Yunita Sari, Erika, Yusuf Hariyoko, dan Adi Soesiantoro. “ANALISIS PELAYANAN DIGITALISASI TRANSPORTASI PADA TRANSPORTASI PUBLIK ‘SUROBOYO BUS’ KOTA SURABAYA.” *PRAJA observer: Jurnal Penelitian Administrasi Publik (e- ISSN: 2797-0469)* 4, no. 02 SE-ADMINISTRASI PUBLIK (1 Maret 2024): 103–11. <https://doi.org/10.2139/ssrn.5008271>.

THESIS

- Aprilia, Gista. “Komunikasi Inovasi Transaksi Elektronik Melalui Program Smart Card di Kota Pekanbaru.” UNIVERSITAS ISLAM NEGERI SULTAN SYARIF KASIM RIAU, 2019.
- PRAYOGA, ARIEF RAHMAN. “TANGGUNGJAWAB PT TRANSJAKARTA DALAM PELAKSANAAN FASILITAS E-TICKETING TERHADAP PENGGUNA JASA TRANSJAKARTA.” Universitas Pembangunan Nasional Veteran Jakarta, 2019.
- PUTRI, DEVI FEBRILIYANTI. “IMPLEMENTASI PERDA KOTA MAGELANG NOMOR 5 TAHUN 2018 TENTANG INOVASI DAERAH DALAM RANGKA MEWUJUDKAN SMART CITY DI KOTA MAGELANG (Studi Kasus Fitur Monggo Lapor Pada Aplikasi Magelang Cerdas).” Universitas Muhammadiyah Magelang, 2023.
- Rahmarani, Sagita Nur Aulia. “Kajian Masalah terhadap izin perkawinan beda agama: Studi kasus penetapan perkara No. 916/Pdt. P/2022/PN. Sby.” Universitas Islam Negeri Maulana Malik Ibrahim, 2024.
- REHADIS, A L L. “PENERAPAN PERATURAN WALIKOTA PEKANBARU NOMOR 26 TAHUN 2019 TENTANG PEDOMAN PENYELENGGARAAN TIKET ELEKTRONIK PADA ANGKUTAN MASSAL TRANS METRO PEKANBARU.” Universitas Islam Negeri Sultan

- Syarif Kasim Riau, 2022. <https://repository.uin-suska.ac.id/id/eprint/58536/>.
- REHADIS, A L L. “PENERAPAN PERATURAN WALIKOTA PEKANBARU NOMOR 26 TAHUN 2019 TENTANG PEDOMAN PENYELENGGARAAN TIKET ELEKTRONIK PADA ANGKUTAN MASSAL TRANS METRO PEKANBARU.” Universitas Islam Negeri Sultan Syarif Kasim Riau, 2022. <https://repository.uin-suska.ac.id/id/eprint/58536/>.
- Sadino, Rizqy. “Implementasi Permenhub pasal 7 nomor 83 Tahun 2021 tentang kriteria dan pelayanan Angkutan Umum: Studi di PO Nori Trans.” Universitas Islam Negeri Maulana Malik Ibrahim, 2025.

LAWS AND REGULATIONS

- Badan Layanan Umum Daerah (BLUD) Dinas Perhubungan Kota Surabaya. Peraturan Wali Kota Surabaya Nomor 22 Tahun 2023 Pasal 14 dan 15 tentang Kontribusi Sampah dalam Penggunaan Layanan (2023).
- Pemerintah Republik Indonesia. “Undang-undang (UU) Nomor 12 Tahun 2011 tentang Pembentukan Peraturan Perundang-Undangan.” Jakarta, 2011.
- . “Undang-undang (UU) Nomor 23 Tahun 2014 tentang Pemerintahan Daerah Pasal 9 ayat (3).” Jakarta, 2014.

APPENDIXES

Appendix 1 Interview Question List

Topik Wawancara

1. Pemahaman dan pelaksanaan Perwali No. 22 Tahun 2023
2. Implementasi sistem electronic-ticket (e-ticket) di Terminal Bungurasih
3. Sarana dan prasarana pendukung e-ticket
4. Pengawasan dan kendala dalam penerapan e-ticket
5. Dampak penerapan e-ticket terhadap ketertiban dan pelayanan
6. Kemaslahatan (manfaat) e-ticket bagi masyarakat pengguna transportasi
7. Upaya perbaikan dan evaluasi kebijakan e-ticket

Pertanyaan Wawancara

1. Bagaimana menurut Bapak/Ibu mengenai Peraturan Wali Kota Surabaya Nomor 22 Tahun 2023 terkait penerapan electronic-ticket di terminal?
2. Sejak kapan kebijakan e-ticket mulai diterapkan di Terminal Bungurasih?
3. Bagaimana pelaksanaan sistem electronic-ticket di Terminal Bungurasih saat ini?
4. Apakah seluruh layanan dan armada bus sudah menerapkan sistem e-ticket? Jika belum, apa alasannya?
5. Bagaimana perbedaan kondisi pelayanan sebelum dan sesudah diterapkannya e-ticket?
6. Apakah sarana dan prasarana pendukung e-ticket (mesin, aplikasi, jaringan, SDM) sudah memadai?
7. Kendala teknis apa saja yang sering muncul dalam penggunaan e-ticket?
8. Bagaimana bentuk pengawasan terhadap penerapan e-ticket di terminal?
9. Apakah terdapat sanksi atau tindakan terhadap pihak yang masih menggunakan sistem tiket konvensional?
10. Apakah penerapan e-ticket berdampak pada pengurangan praktik percaloan dan pembayaran tunai?
11. Bagaimana pengaruh e-ticket terhadap ketertiban penumpang dan pengaturan jumlah penumpang (overload)?
12. Menurut Bapak/Ibu, apakah penerapan e-ticket sudah memberikan manfaat nyata bagi masyarakat pengguna transportasi?
13. Apakah sistem e-ticket mampu meningkatkan keamanan, kenyamanan, dan transparansi pelayanan?
14. Apakah masih ada masyarakat yang justru merasa kesulitan dengan sistem e-ticket?
15. Apa saja hambatan utama dalam penerapan e-ticket di Terminal Bungurasih?



**KEMENTERIAN PERHUBUNGAN
DIREKTORAT JENDERAL PERHUBUNGAN DARAT
BALAI PENGELOLA TRANSPORTASI DARAT KELAS II JAWA TIMUR**

JL. MENANGGAL MGE NO.12
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Nomor : UM.209/1/18/BPTD.JATIM-2026
Klasifikasi : Biasa
Lampiran : 1 (Satu) Lembar
Hal : Izin Penelitian

Surabaya, 2 Maret 2026

Yth. Dekan Fakultas Syariah Universitas Islam Negeri Maulana Malik Ibrahim Malang

Menindaklanjuti Dekan Fakultas Syariah Universitas Islam Negeri Maulana Malik Ibrahim Malang Nomor: 112/F.Sy.1/TL.01/01/2026 tanggal 19 Februari 2026 perihal Permohonan Izin Penelitian di Satuan Pelayanan Terminal Tipe A Purabaya Sidoarjo BPTD Kelas II Jawa Timur, bersama ini dapat kami sampaikan mahasiswa yang dimaksud sebagai berikut:

No	Nama Mahasiswa	NRP	Program Studi	Waktu Penelitian
1.	Galuh Kusuma Dewi	220202110099	S1 Hukum Ekonomi Syariah	3 Maret 2026

Bahwa pada prinsipnya kami mendukung dan menyetujui pelaksanaan kegiatan tersebut sesuai dengan ketentuan, tidak mengganggu kegiatan dan pelayanan di Satuan Pelayanan Terminal Tipe A Purabaya Sidoarjo BPTD Kelas II Jawa Timur, Segala biaya ditanggung oleh pemohon.

Demikian disampaikan, atas perhatian dan kerjasamanya diucapkan terima kasih.

Kepala Balai,



Bambang Hermanto, S.Si, M.Sc
NIP.19770813 200604 1 001

Tembusan :

1. Para Pejabat Struktural BPTD Kelas II Jawa Timur;
2. Plt. Pengawas Satuan Pelayanan Terminal Tipe A Purabaya Sidoarjo

Appendix 3 Research Documentation



Figure 2 Interview with the Head of Purabaya Terminal



Figure 3 Interview with a Transportation Facilities and Infrastructure Officer at Purabaya Terminal





Figure 4 Interview with a Passenger at Purabaya

CURRICULUM VITAE



A. Self-Identity

Name	:	Galuh Kusuma Dewi
Place and Date of Birth	:	Adiluwih, 08 Januari 2003
Student ID Number	:	220202110099
Department	:	Sharia Economic Law
Address in Malang	:	Jalan Kanjuruhan No. 14, Kel. Tlogomas, Kec. Lowokwaru, Kota Malang, Jawa Timur
Home Address	:	Bumi Dipasena Sejahtera, 12-29-07, Kec. Rawajitu Timur, Kab. Tulang Bawang, Lampung
Phone Number	:	081272506918
Email	:	kusumadewigaluh81@gmail.com

B. Educational Background

No.	Education Level	School Names	Year
1.	Elementary School	SDN 01 Bumi Dipasena Sejahtera	2009-2015
2.	Junior High School	SMPN 01 Adiluwih	2015-2018
3.	Senior High School	MA Al-Mahrusyiah	2018-2021