

Legal Research Trends on Legal Protection in E-Commerce Transactions in Indonesia

1. Tegar chrstanto bagaskara, Universitas Muhammadiyah Sidoarjo, Indonesia*
tegarrbagaskaraa@gmail.com
2. Sri Budi Purwaningsih, Universitas Muhammadiyah Sidoarjo, Indonesia
sribudi@umsida.ac.id
3. Noor Fatimah Mediawati, Universitas Muhammadiyah Sidoarjo, Indonesia
fatimah@umsida.ac.id
4. Moh. Faizin, Universitas Muhammadiyah Sidoarjo, Indonesia
faizin@umsida.ac.id

* Corresponding Author

Abstract

The Cash on Delivery (COD) payment system within e-commerce, it has been found that legal protection for couriers is often overlooked. Couriers face risks such as fraud, intimidation, and unpleasant treatment from consumers due to the unclear definition of their rights and obligations, as well as the lack of clear regulations concerning occupational safety. Consumers' lack of understanding regarding COD procedures also frequently places couriers in difficult situations. Using a quantitative literature review method, research findings indicate that between 2019 and 2024 there has been an inconsistent trend in the number of studies addressing this issue. There remains a need for public education, regulatory updates, and the establishment of clear and effective legal protection mechanisms for couriers.

Keywords: Legal; Research Trend; Protection; E-Commerce; Transaction.



Article History

Submitted:
24 March 2025
Reviewed:
16 April 2025
Accepted:
12 June 2025

Introduction

E-commerce serves as a platform where producers and consumers engage in buying and selling activities without meeting face-to-face; in other words, transactions are conducted online. The majority of Indonesians use e-commerce for buying and selling due to its ease of use, affordability, and efficiency. Over time, e-commerce has undergone numerous changes, one of which is the addition of new payment systems. While initially limited to interbank transfers, it now includes the Cash on Delivery (COD) payment method. This development has facilitated a more accessible relationship between buyers and sellers through the use of COD.¹

The formation of an agreement arises from a contract between the parties involved, namely the buyer and the seller. Where there is a contract between parties, it gives rise to specific rights and obligations that must be fulfilled by each party. According to Article 1458 of the Indonesian Civil Code, a sale and purchase can be deemed valid even if the product has not yet been delivered or the payment has not yet been made, provided that both parties have agreed on all essential elements of the contract, such as the commodity and its price.²

In the context of the Cash on Delivery (COD) payment system within e-commerce, this method is typically chosen by consumers who do not possess a bank account or other forms of digital payment to complete a transaction via transfer. COD enables such consumers to pay for goods directly to the courier upon delivery at the recipient's address. The implementation of this system requires cooperation between sellers and delivery service providers, as courier companies play a crucial role in the rapid growth of e-commerce. These delivery service providers act as intermediaries, bridging the gap between sellers and buyers. This interdependence has intensified competition, driven by the parallel growth of online businesses and logistics service providers.³

However, in practice, numerous issues persist with the use of the COD payment system in society today. According to *kompas.tv* on 29 January 2023, there was a case in Banyuasin, South Sumatra, where a COD courier was

¹ Muhamad Bilal and Imam Budi Santoso, 'Analisis Perlindungan Hukum Terhadap Kurir Dalam Transaksi Cash On Delivery (COD)', *JUSTITIA Jurnal Ilmu Hukum Dan Humaniora* 6, no. 2 (2023), pp. 339–339, doi:10.31604/justitia.v6i2.339-349.

² Afida Ainur Rokfa and others, 'Penyelesaian Sengketa Sistem Pembayaran Cash On Delivery (Cod) Pada Media E-Commerce', *Jurnal Bina Mulia Hukum*, 6.2 (2022), pp. 161–73, doi:10.23920/jbmh.v6i2.533.

³ Teten Tendiyanto, Destri Tsurayya Istiqamah, and Suwandoko Suwandoko, 'Perlindungan Pelaku Usaha Jual Beli Online Dengan Sistem Pembayaran Cash on Delivery', *JCIC : Jurnal CIC Lembaga Riset Dan Konsultan Sosial* 5, no. 1 (2023), pp. 39–44, doi:10.51486/jbo.v5i1.89.

Legal Research Trends

stabbed by a customer who refused to pay. More recently, on 7 September 2023, merdeka.com reported that a courier in South Denpasar, Bali, was assaulted by a female customer who became enraged and refused to pay for her COD order. Such incidents reflect growing dissatisfaction and frustration expressed by consumers toward couriers, often due to goods being received in unsatisfactory condition. This has led to threats and even physical violence against couriers, highlighting the urgent need for legal regulations that specifically protect couriers in such situations.⁴

From a legal perspective, the courier's main responsibility is limited to delivering the goods to the recipient's address and collecting the payment for those goods. They are not accountable for any discrepancies or defects in the goods delivered. This is often misunderstood by consumers, leading to unfair treatment of couriers. According to Article 1313 of the Indonesian Civil Code, once a contract of sale and purchase is formed between seller and buyer, both parties are legally bound to fulfil the obligations agreed upon in that contract. Within the COD payment system, consumers are obliged to pay for goods upon receipt, thus they must honor their contractual commitments. Any dissatisfaction regarding the goods should be directed to the seller, not the courier.⁵

In e-commerce transactions involving COD, sellers entrust the task of delivering goods to couriers, thereby establishing the courier's obligation to ensure safe delivery to the customer. This necessarily results in direct interaction between couriers and consumers. However, this process does not always proceed as expected. Many consumers refuse to pay for items upon delivery, claiming the goods are not as described, and consequently direct their anger and disappointment toward couriers, including acts of threat and physical assault. Such events cause both material and immaterial harm to couriers.

Cases of breach of contract in online sales are no longer uncommon. The non-conformity of goods sent by sellers remains a recurring problem, and previous research has primarily focused on the seller's obligations regarding product conformity in COD-based e-commerce transactions. To date, limited research

⁴ Heristiawan Aryo Wirotomo, 'Perlindungan Hukum Bagi Kurir Jasa Pengiriman Barang Dalam Transaksi Jual Beli Online Secara Cash On Delivery', *Jurnal Studi Hukum Modern*, 6.2 (2024) <<https://journalpedia.com/1/index.php/jshm/article/view/1188>>.

⁵ Setiawati Gulo, 'Transaksie-Commerce Dengan Sistem Cash on Delivery Dalam Persepektif Peraturan Perundang Undangan Di Indonesia', *Other, hukum*, 2021 <<https://repository.unja.ac.id/24144/>>.

has explored the legal position of consumers, sellers, and especially couriers, or examined the legal protection for couriers as workers in instances where the seller breaches the agreement by delivering non-compliant goods.⁶

Several prior studies have addressed the issue of courier protection in COD transactions. For example, a 2023 study by Muhammad Bilal and Imam Budi Santoso entitled “Legal Protection Analysis for Couriers in Cash on Delivery Transactions” published in *Jurnal Justitia*, University of Singaperbangsa Karawang, discusses legal protection for couriers under the COD system. Another study by I Wayan Gede Wiryawan (2021), titled “The Urgency of Courier Protection in E-Commerce Transactions Using the COD System”, published in *Jurnal Analisis Hukum*, Vol. 2, No. 2, outlines the rights and obligations of couriers in e-commerce transactions. However, the majority of existing research primarily considers courier protection through the lens of the Indonesian Consumer Protection Law (UUPK).⁷

Therefore, the research presented in this study differs from previous works. It focuses on the trends in legal research concerning the protection of couriers in e-commerce transactions under the COD payment system. Through a normative juridical approach, this study aims to examine the legal status of all parties involved, particularly the courier, and to identify gaps in regulation that could be addressed to ensure better legal safeguards.

Method

This research employs descriptive analysis of the data obtained. The study presents the findings of a literature search concerning legal research trends and protection in Cash on Delivery (COD) transactions within the context of e-commerce in Indonesia.⁸ A quantitative literature review method was utilized, with data collected from two electronic databases: Google Scholar and Lens.org. The keywords used were “Cash on Delivery”, “E-commerce”, and “courier legal protection”. Articles were selected based on specific inclusion criteria, which limited the publication period to the last five years (2019–2024).

⁶ S. Setjoatmadja and D. Puspitasari, ‘Akibat Hukum Pembatalan Jual Beli Sepihak Melalui Marketplace Oleh Pembeli Dengan Sistem Pembayaran Cash On Delivery (COD) Ditinjau Dari KUHPdata’, *Innovative: Journal Of Social Science Research*, 4.3 (2024), pp. 4443-4457 ..

⁷ S.T. Andani, ‘Perlindungan Yuridis Terhadap Konsumen Dan Pelaku Usaha Dalam Transaksi E-Commerce Melalui Sistem Pembayaran Cash On Delivery (COD)’ (unpublished (Doctoral Dissertation, Universitas Panca Marga).,” n.d, 2022).

⁸ Irwansyah, *PENELITIAN HUKUM: Pilihan Metode Dan Praktik Penulisan Artikel*, Revisi (Mirra Buana Media, 2021).

Legal Research Trends

Table 1. Inclusion and Exclusion Criteria

No	Inclusion Criteria	Exclusion Criteria
1	Publications from 2019 to 2024	Publications prior to 2019
2	Specifically related to Cash on Delivery in E-commerce	General e-commerce topics such as customer or seller satisfaction
3	Written in the Indonesian language	Written in English
4	Articles that contain the term "Law"	Articles without the term "Law"

To address the issues discussed in this article, a systematic data search was conducted using several steps. The first step involved accessing Lens.org through the Scholarly Works section, using three sets of keywords:

1. By entering the keyword "E-Commerce and Cash on Delivery", an initial total of 1,289 journal articles was found. This was narrowed down to 251 articles after filtering by publication year (2019–2024), and further refined to 220 journal articles after setting the document type to Journal Article.
2. The second search used the keyword "*Perlindungan Kurir*" (Courier Protection) with the document type set to Journal Article and the time range from 2019 to 2024, yielding 26 journal articles.
3. The third search used the keyword "*Sistem Pembayaran COD*" (COD Payment System), again filtering by document type (Journal Article) and publication year (2019–2024), resulting in 44 journal articles.

Results and Discussion

1. Trends in Legal Research Related to COD in the Years 2019–2024

Based on the analysis conducted using the electronic database Lens.org, by entering the keyword "E-commerce and Cash on Delivery", a total of 1,289 journal articles were initially found. After applying a filter for publication years 2019 to 2024, the number was narrowed down to 251 journals. Further filtering by document type to include only Journal Articles reduced the results to 220 articles. From these 220 journal articles, 10 relevant journal articles were identified that specifically addressed legal research trends in e-commerce transactions using the COD payment method. The trend of legal research publications on COD-based transactions in e-commerce, viewed by year of publication, is presented in Figure 1 below:

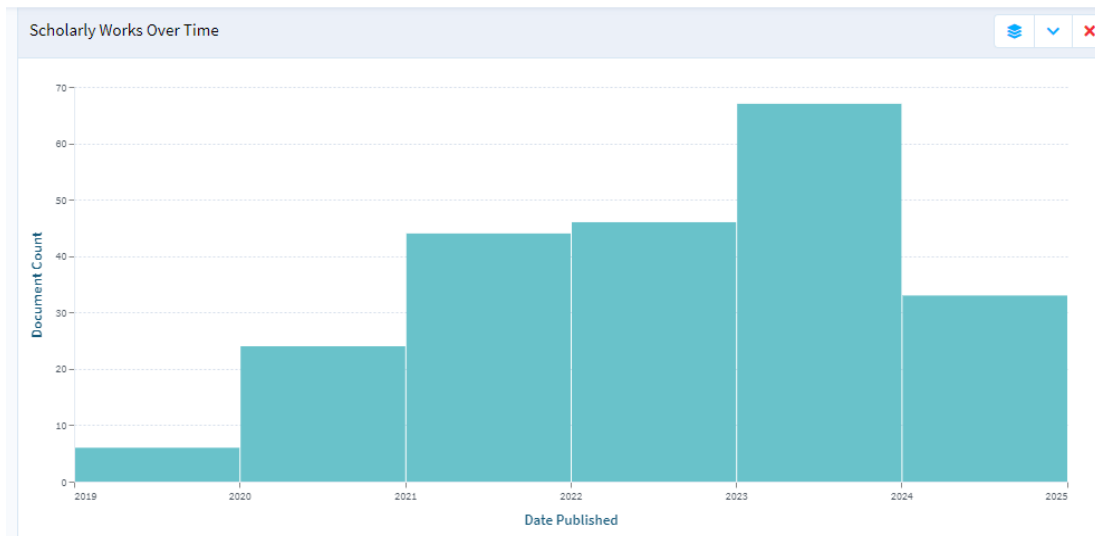


Figure 1. Number of Studies Based on Year of Publication Criteria Source:
<https://www.lens.org/>

From the figure above, it can be observed that research or studies related to the COD payment system in e-commerce published between 2019 and 2024 have shown an inconsistent trend, with fluctuations in the number of publications. From 2019 to 2023, the number of publications increased annually, with a particularly significant rise in 2023, during which 67 journal articles were published. However, in 2024, the number of publications declined, with 33 journal articles recorded for that year.

According to Figure 1, which illustrates the trend of journal article publications from 2019 to 2024, the COD payment method is considered crucial in building consumer trust towards businesses and the products they offer, while also facilitating cash payments upon receipt of goods. The principle of good faith must be upheld in the execution of e-commerce agreements, especially by consumers who choose to utilize the COD feature, to prevent arbitrary actions that may harm business actors.⁹

The percentage of COD usage in e-commerce transactions is presented in the following pie chart:

⁹ I.Wayan Gde Wiryawan, 'Urgensi Perlindungan Kurir Dalam Transaksi E-Commerce Dengan Sistem COD (Cash On Delivery)', *September*, 28 (2021) <<https://lens.org/023-206-676-981-151>>.

Legal Research Trends

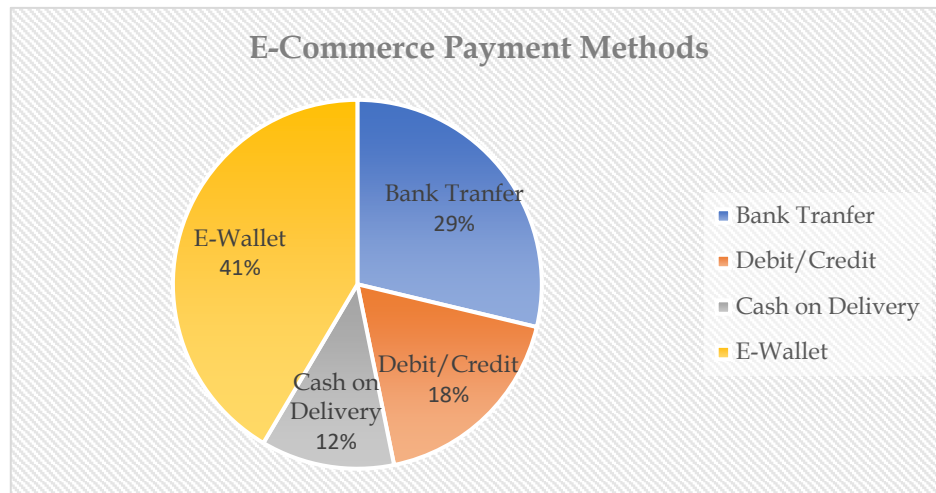


Diagram 1. Usage of Payment Systems in E-commerce Data Source:

<https://kumparan.com/>

Based on the pie chart above, it is shown that the most widely used payment method in e-commerce is e-wallets or digital wallets, accounting for 41% of transactions. This is followed by bank transfers at 29%, debit or credit card payments at 18%, and Cash on Delivery (COD) at 12%. In Indonesia, the trend of e-commerce users has experienced substantial growth from year to year, as observed over the past few years.¹⁰ The table below presents the percentage growth in the number of e-commerce users in Indonesia from 2017 to 2023:

Table 2. Percentage of E-commerce Users in Indonesia

No.	Year	E-commerce User Penetration (%)	E-commerce Users (Individuals)
1.	2017	52.5%	139,000,000
2.	2018	57.6%	154,100,000
3.	2019	62.2%	168,300,000
4.	2020	66.3%	181,500,000
5.	2021	69.9%	193,200,000
6.	2022	72.9%	203,500,000
7.	2023	75.3%	212,200,000

Source: <https://databoks.katadata.co.id>

Based on the table above, it can be seen that the level of e-commerce usage in Indonesia has increased from year to year. In 2017, the number of e-commerce users was 139 million, which rose by 10.8% to 154.1 million in 2018, and peaked in 2023 with 212.2 million users. This indicates that Indonesian society

¹⁰ S. Tyaningsih and R.A. Prastyanti, 'Perspektif Hukum Terhadap Pembatalan Pembayaran Konsumen Dalam E-Commerce Menggunakan Cash On Delivery (COD)', *Socius: Jurnal Penelitian Ilmu-Ilmu Sosial*, 1.5 (2023).

increasingly prefers to conduct buying and selling transactions online through e-commerce platforms or similar services.¹¹

2. Attention to Legal Protection for Couriers in COD Payments

Furthermore, the mapping of articles used as literature data in accordance with the inclusion criteria was carried out using two keywords: the first keyword being “courier protection” and the second “Cash on Delivery Payment System”. The search was conducted using the electronic database Lens.org, using the filter for publication years from 2019 to 2024 and document type as journal articles.

Using the first keyword “courier protection”, a total of 26 journal articles were found. After applying the inclusion criteria, 6 articles were deemed relevant. Using the second keyword “cash on delivery payment system”, a total of 44 journal articles were identified, and after applying the same criteria, 4 articles were considered suitable.¹²

The selected journal articles that met the inclusion criteria are presented in the table below:

¹¹ Dewi Rahmawati Gustini, ‘Diskursus Penolakan COD (Cash on Delivery) Oleh Konsumen Di Media Online Dalam Perspektif Hukum Perdagangan’, *JUDICIOUS*, 3.2 (2022), pp. 207–16, doi:10.37010/jdc.v3i2.1116.

¹² Rahmat Kurniawan Darmanto, ‘PERLINDUNGAN HUKUM TERHADAP JASA PENGIRIMAN BARANG (KURIR’, *DALAM SISTEM CASH ON DELIVERY (COD) DIKAITKAN DENGAN KUHPER PASAL 1792.*” *JUSTITIA Jurnal Ilmu Hukum Dan Humaniora* 6, no. 2 (2023), pp. 459–459, doi:10.31604/justitia.v6i2.459-467.

Legal Research Trends

Table 3. Characteristics of Articles that Meet the Inclusion Criteria

Author(s)	Year/Country	Research Objective	Findings	Implication
I Wayan Gede Wiryawan	2021/Indonesia	To examine the rights and obligations of couriers in the COD (Cash on Delivery) system and their legal protection in the event of consumer complaints in e-commerce transactions using COD.	The involvement of multiple parties in COD transactions has the potential to cause significant problems if any party fails to understand the legal construction arising from their agreement, leading to ignorance of their rights and obligations.	Legal relationships between buyers and sellers create mutual rights and obligations. When a buyer refuses to complete payment, it results in breach of contract (<i>wanprestasi</i>).
Neozatel Azriel, Rani Apriani, Holyone Singadimedja	2023/Indonesia	<ul style="list-style-type: none"> - To understand the regulations and implementation for couriers within the e-commerce COD system. - To understand the regulations and implementation for consumers in the same context. 	Public knowledge regarding COD policies and procedures in e-commerce remains lacking.	Ineffective education for the public about e-commerce transaction concepts leads to mistaking and misapplication.
Indriana	2022/Indonesia	To determine who is responsible in COD cases and the form of that responsibility.	Business actors often act in bad faith regarding product delivery, while consumers are unaware and act in bad faith regarding payment.	Responsibility is shared jointly (<i>tanggung renteng</i>) between the e-commerce platform and the business actors.

Rais Agil Bahtiar	2020/Indonesia	To examine the role of the government in addressing issues related to the rise of e-commerce and its impact on the national economic cycle.	The rapid development of e-commerce is driven by increased income from e-commerce transactions.	The government must have strategic policies to maximize the economic potential of growing e-commerce usage.
Nabil Abduh Qadil, Chelsea Mutiara Putri, Dinda Yunisa	2022/Indonesia	<ul style="list-style-type: none"> - To identify the shortcomings of online transactions, especially in COD systems in Indonesia. - To evaluate the role of legal regulations in addressing these issues. 	Misconceptions about COD among buyers and negligence by sellers in providing accurate product information are still common.	Law plays a crucial role in evaluating the COD system in online transactions and must adapt to societal developments.
Fanny Angelina Simbolon, Abraham Ferry Rosando	2023/Indonesia	To examine the legal protection for online sellers in the event of product returns by consumers using COD.	There is a reciprocal legal relationship between sellers and consumers, based on legal subject rights and obligations.	In case of disputes, either party can file a lawsuit under Article 38 and Article 39(1) of the Electronic Information and Transactions (ITE) Law.
Silviasari	2020/Indonesia	To examine dispute resolution in e-commerce transactions using COD.	Dispute resolution may be conducted out of court by involving the Consumer Dispute Settlement Board (BPSK). BPSK is	Consumer Protection Law (UUPK) has provisions for resolving consumer disputes.

Legal Research Trends

			required to issue a decision within 21 working days.	
Heristiawan Aryo Wirotomo	2024/Indonesia	To examine the rights and obligations of parties in COD transactions, legal protection for couriers, and dispute resolution mechanisms.	Couriers often face risks such as fraud and mistreatment from consumers.	There is a need for a more effective and efficient dispute resolution mechanism.
Adi Kristian Silalahi, Elisatris Gultom, Susilowati Suparto	2022/Indonesia	To examine the protection available for sellers and the actions they can take if harmed by consumers.	Marketplaces offering COD must respond quickly to sellers' complaints about losses from consumer breach of contract.	The government must improve regulations to better protect the rights of online business actors.
Dani Lailatul Magviro, Yasid Amali	2023/Indonesia	To examine how the law protects couriers in online transactions, especially in COD systems.	Couriers should not be held liable for product damages or errors not caused by their own negligence.	There is a need for better legal regulations focused on courier work safety and liability clarity for delivered goods.

Based on a systematic analysis of ten research articles that met the inclusion criteria—specifically addressing e-commerce transactions using the Cash on Delivery (COD) payment method—several legal research trends concerning this topic can be identified. The most prominent trend is the growing attention towards legal protection for various parties involved in COD transactions, particularly couriers, business operators, and consumers.

An important study by Rais Agil Bahtiar (2020) highlights that e-commerce, as a process of buying and selling goods and services via digital technology, offers various benefits such as transaction cost efficiency, the elimination of geographical and time constraints, and enhanced communication between buyers and sellers.¹³ However, he also emphasizes the vital role of the government in formulating strategic policies to address the challenges of e-commerce, including consumer protection, infrastructure, logistics, and digital taxation. The government is encouraged to promote the digital economy ecosystem through strategies such as knowledge dissemination, subsidies, innovation targeting, and the establishment of regulatory standards.¹⁴

Furthermore, I Wayan Gede Wiryawan (2021)¹⁵ and Heristiawan Aryo Wirotomo (2024)¹⁶ particularly stress the importance of legal protection for couriers, who act as physical intermediaries in the COD system. They point out that couriers are often the most vulnerable party, bearing the brunt of imbalanced rights and obligations in transactions, including exposure to fraud or unpleasant treatment from consumers.

Meanwhile, Fanny Angelina Simbolon and Abraham Ferry Rosando (2023)¹⁷ focus their attention on online business actors, who also face legal vulnerabilities when goods are returned by consumers without valid justification. Although the COD payment system facilitates transactions for consumers, it also presents legal loopholes that are yet to be clearly and fairly

¹³ Rais Agil Bahtiar, 'Potensi, Peran Pemerintah, Dan Tantangan Dalam Pengembangan e-Commerce Di Indonesia [Potency, Government Role, and Challenges of e-Commerce Development in Indonesia]', *Jurnal Ekonomi Dan Kebijakan Publik*, 11.1 (2020), pp. 13-25 ..

¹⁴ Silviasari Silviasari, 'PENYELESAIAN SENGKETA KONSUMEN DAN PELAKU USAHA DALAM TRANSAKSI E-COMMERCE MELALUI SISTEM CASH ON DELIVERY', *Media of Law and Sharia*, 1.3 (2020), pp. 151–61, doi:10.18196/mls.v1i3.9192.

¹⁵ Wiryawan, 'Urgensi Perlindungan Kurir Dalam Transaksi E-Commerce Dengan Sistem COD (Cash On Delivery)'.

¹⁶ Wirotomo, 'Perlindungan Hukum Bagi Kurir Jasa Pengiriman Barang Dalam Transaksi Jual Beli Online Secara Cash On Delivery'.

¹⁷ F.A. Simbolon and A.F. Rosando, 'Bentuk Perlindungan Hukum Bagi Pelaku Usaha Online Dalam Retur Barang Sistem Cash On Delivery (COD)', *Innovative: Journal Of Social Science Research*, 3.6 (2023), pp. 10509-10526 ..

Legal Research Trends

regulated, especially regarding accountability and dispute resolution mechanisms.¹⁸

Moreover, Grace Evelyn Pardede and Ferdinand Sujanto (2022)¹⁹ along with Adi Kristian Silalahi et al. (2022) underscore the urgency of legal reform and the harmonization of regulations across e-commerce platforms. The regulatory inconsistency among different service providers potentially leads to legal uncertainty for both business actors and consumers. They advocate for a uniform and responsive legal framework to keep pace with the evolving dynamics of digital commerce, thereby enhancing public trust in the COD system.

Thus, the findings reveal that the COD payment system requires comprehensive legal protection and firm policy implementation to ensure that all parties involved—particularly couriers and business operators—receive legal certainty and fair treatment. This is crucial in supporting the sustainable growth of the digital economy in Indonesia.²⁰

Conclusion

The trend of legal research on e-commerce transactions using the Cash on Delivery (COD) payment method, published between 2019 and 2024, has shown an inconsistent growth pattern. The year 2024 marks the peak in the number of published articles on e-commerce. In Indonesia, the legal research trend in COD-based e-commerce transactions is shifting from merely identifying issues to formulating concrete solutions. This trend includes efforts to enhance legal protection, clarify regulations, and adapt the law to technological advancements and changing consumer behavior in the digital era.

Authors' Declaration

Author Contribution : All of author participated in this article based on their contribution. First and second authors have drafted the research findings while third and fourth authors both analyzed in a discussion pattern as well as conclude the whole results.

¹⁸ N. Azriel, R. Apriani, and H. Singadimedja, 'Upaya Perlindungan Hukum Bagi Kurir Paket Dalam Transaksi E-Commerce Menggunakan Sistem Cod (Cash On Delivery)', *NUSANTARA: Jurnal Ilmu Pengetahuan Sosial*, 10.11 (2023), pp. 5264-5269 ..

¹⁹ G.E. Pardede and F. Sujanto, 'Urgensi Penyeragaman Kebijakan Cod Pada Marketplace Indonesia Demi Mewujudkan Perlindungan Hukum', *Journal of Economic and Business Law Review*, 2.2 (2022), pp. 73-89 ..

²⁰ Pardede and Sujanto, 'Urgensi Penyeragaman Kebijakan Cod Pada Marketplace Indonesia Demi Mewujudkan Perlindungan Hukum'.

Funding Statement : There is no funding in this article
Conflict of Interest : There is no conflict of interest between the authors
Additional Information : No additional information is needed

References

- Andani, S.T., 'Perlindungan Yuridis Terhadap Konsumen Dan Pelaku Usaha Dalam Transaksi E-Commerce Melalui Sistem Pembayaran Cash On Delivery (COD' (unpublished (Doctoral Dissertation, Universitas Panca Marga).," n.d, 2022)
- Azriel, N., R. Apriani, and H. Singadimedja, 'Upaya Perlindungan Hukum Bagi Kurir Paket Dalam Transaksi E-Commerce Menggunakan Sistem Cod (Cash On Delivery', *NUSANTARA: Jurnal Ilmu Pengetahuan Sosial*, 10.11 (2023), pp. 5264-5269 ,
- Bahtiar, Rais Agil, 'Potensi, Peran Pemerintah, Dan Tantangan Dalam Pengembangan e-Commerce Di Indonesia [Potency, Government Role, and Challenges of e-Commerce Development in Indonesia', *Jurnal Ekonomi Dan Kebijakan Publik*, 11.1 (2020), pp. 13-25 ,
- Bilal, Muhamad, and Imam Budi Santoso, 'Analisis Perlindungan Hukum Terhadap Kurir Dalam Transaksi Cash On Delivery (COD', *JUSTITIA Jurnal Ilmu Hukum Dan Humaniora* 6, no. 2 (2023), pp. 339-339, doi:10.31604/justitia.v6i2.339-349.
- Darmanto, Rahmat Kurniawan, 'Perlindungan Hukum Terhadap Jasa Pengiriman Barang (Kurir', *Dalam Sistem Cash On Delivery (Cod) Dikaitkan Dengan Kuhper Pasal 1792).*" *JUSTITIA Jurnal Ilmu Hukum Dan Humaniora* 6, no. 2 (2023), pp. 459-459, doi:10.31604/justitia.v6i2.459-467.
- Gulo, Setiawati, 'Transaksie-Commerce Dengan Sistem Cash on Delivery Dalam Persepektif Peraturan Perundang Undangan Di Indonesia', *Other, hukum*, 2021 <<https://repository.unja.ac.id/24144/>>.
- Gustini, Dewi Rahmawati, 'Diskursus Penolakan COD (Cash on Delivery) Oleh Konsumen Di Media Online Dalam Perspektif Hukum Perdagangan', *JUDICIOUS*, 3.2 (2022), pp. 207-16, doi:10.37010/jdc.v3i2.1116.
- Irwansyah, *PENELITIAN HUKUM: Pilihan Metode Dan Praktik Penulisan Artikel*, Revisi (Mirra Buana Media, 2021)

Legal Research Trends

- Pardede, G.E., and F. Sujanto, 'Urgensi Penyeragaman Kebijakan Cod Pada Marketplace Indonesia Demi Mewujudkan Perlindungan Hukum', *Journal of Economic and Business Law Review*, 2.2 (2022), pp. 73-89 ,
- Rokfa, Afida Ainur, and others, 'Penyelesaian Sengketa Sistem Pembayaran Cash On Delivery (Cod) Pada Media E-Commerce', *Jurnal Bina Mulia Hukum*, 6.2 (2022), pp. 161-73, doi:10.23920/jbmh.v6i2.533.
- Setjoatmadja, S., and D. Puspitasari, 'Akibat Hukum Pembatalan Jual Beli Sepihak Melalui Marketplace Oleh Pembeli Dengan Sistem Pembayaran Cash On Delivery (COD) Ditinjau Dari KUHPerdara', *Innovative: Journal Of Social Science Research*, 4.3 (2024), pp. 4443-4457 ,
- Silviasari, Silviasari, 'Penyelesaian Sengketa Konsumen Dan Pelaku Usaha Dalam Transaksi E-Commerce Melalui Sistem Cash On Delivery', *Media of Law and Sharia*, 1.3 (2020), pp. 151-61, doi:10.18196/mls.v1i3.9192.
- Simbolon, F.A., and A.F. Rosando, 'Bentuk Perlindungan Hukum Bagi Pelaku Usaha Online Dalam Retur Barang Sistem Cash On Delivery (COD)', *Innovative: Journal Of Social Science Research*, 3.6 (2023), pp. 10509-10526.
- Tendiyanto, Teten, Destri Tsurayya Istiqamah, and Suwandoko Suwandoko, 'Perlindungan Pelaku Usaha Jual Beli Online Dengan Sistem Pembayaran Cash on Delivery', *JCIC: Jurnal CIC Lembaga Riset Dan Konsultan Sosial* 5, no. 1 (2023), pp. 39-44, doi:10.51486/jbo.v5i1.89.
- Tyaningsih, S., and R.A. Prastyanti, 'Perspektif Hukum Terhadap Pembatalan Pembayaran Konsumen Dalam E-Commerce Menggunakan Cash On Delivery (COD)', *Socius: Jurnal Penelitian Ilmu-Ilmu Sosial*, 1.5 (2023)
- Wiroto, Heristiawan Aryo, 'Perlindungan Hukum Bagi Kurir Jasa Pengiriman Barang Dalam Transaksi Jual Beli Online Secara Cash On Delivery', *Jurnal Studi Hukum Modern*, 6.2 (2024) <<https://journalpedia.com/1/index.php/jshm/article/view/1188>>
- Wiryawan, I.Wayan Gde, 'Urgensi Perlindungan Kurir Dalam Transaksi E-Commerce Dengan Sistem COD (Cash On Delivery)', *September*, 28 (2021) <<https://lens.org/023-206-676-981-151>>