

TAXPAYERS' PERCEPTION OF THE IMPLEMENTATION OF MOTOR VEHICLE TAX OPSEN: A CASE STUDY IN MADIUN REGENCY

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Abstrak

Kebijakan opsen Pajak Kendaraan Bermotor yang berlaku sejak Januari 2025 berdasarkan Undang-Undang Nomor 1 Tahun 2022 tentang HKPD menimbulkan tanggapan beragam di kalangan wajib pajak, sementara kesalahpahaman masyarakat berpotensi memicu ketidakpatuhan. Penelitian ini bertujuan mengetahui persepsi wajib pajak Kabupaten Madiun terhadap penerapan opsen PKB serta pemahaman mereka atas kontribusinya bagi Pendapatan Asli Daerah. Kajian menggunakan teori atribusi Weiner melalui tiga dimensi, yaitu *locus of control*, *stability*, dan *controllability*, sebagai kerangka analisis persepsi. Penelitian menggunakan metode kualitatif dengan pendekatan studi kasus di Badan Pendapatan Daerah Kabupaten Madiun, dengan data digali melalui wawancara semi terstruktur, observasi, dan dokumentasi terhadap enam wajib pajak dan satu pegawai Bapenda. Hasil penelitian menunjukkan pengetahuan wajib pajak terhadap istilah opsen PKB masih rendah akibat minimnya sosialisasi, namun kepatuhan membayar pajak tetap tinggi karena didorong kesadaran kewajiban. Penelitian ini menyimpulkan bahwa kepatuhan pajak tidak selalu berbanding lurus dengan literasi kebijakan wajib pajak.

Kata Kunci: Persepsi Wajib Pajak, Opsen Pajak Kendaraan Bermotor, Teori Atribusi, Kepatuhan pajak, Pendapatan Asli Daerah

Abstract

The Motor Vehicle Tax (PKB) opsen policy which has been in effect since January 2025 based on Law Number 1 of 2022 concerning Financial Relations between the Central Government and Regional Governments (HKPD) has caused mixed responses among taxpayers, while public misunderstandings have the potential to trigger non-compliance. This study aims to find out the perception of Madiun Regency taxpayers towards the implementation of the PKB opsen as well as their understanding of its contribution to Regional Original Revenue (PAD). The study uses Weiner's attribution theory through three dimensions, namely the locus of control, stability, and

controllability, as a framework for perception analysis. The research uses a qualitative method with a case study approach at the Regional Revenue Agency (Bapenda) of Madiun Regency, with data explored through semi-structured interviews, observations, and documentation of six taxpayers and one Bapenda employee. The results of the study show that taxpayers' knowledge of the term PKB opsen is still low due to the lack of socialization, but compliance with paying taxes remains high because it is driven by awareness of obligations and practical considerations. This study concludes that tax compliance is not always directly proportional to taxpayer policy literacy.

Keywords: *Taxpayer Perception, Motor Vehicle Tax Opsen, Attribution Theory, Tax Compliance, Regional Original Revenue*

A. INTRODUCTION

Taxes are the main source of state funding which is very important to fund the implementation of government and development (Rusli & Nainggolan, 2021). The State Revenue and Expenditure Budget (APBN) makes this clear, where tax revenues make up the majority of state revenue (Khafidah & Indriasih, 2021). From the total state revenue target of IDR 1,699 trillion in 2020, the tax revenue target reached IDR 1,404 trillion, or accounted for 82.6% of state revenue (Ainniyya et al., 2021). Overall, taxes account for more than 70% of state revenue, indicating the high dependence on this sector to meet budget needs.

Taxes in Indonesia are divided into central taxes and regional taxes (Romadhona & Ma'ruf, 2025). Based on Law Number 23 of 2014 concerning Regional Government, local governments are given the authority to autonomously manage and carry out government affairs according to the concept of regional autonomy. Local governments are given the authority to finance the development of their regions independently, although the central government retains strategic control over state finances in general (Nabawi et al., 2025). However, the 2024 report by the Directorate General of Financial Balance (DJPK) reveals that transfer funds from the central government still dominate regional revenues compared to Regional Original Revenue (PAD): around 28.7% of regional revenue comes from PAD, while 65.7% comes from central government transfers (Rona Susan Nurjanah, 2025). This condition shows that local

governments in Indonesia still have a low level of fiscal independence and are highly dependent on central transfers (Zakaria & Dede, 2022), one of which is due to regional capacity that has not been optimal in exploring regional tax potential (Ering et al., 2023; Zakaria & Dede, 2022).

One type of regional tax that is the mainstay of the district/city government is the Motor Vehicle Tax (PKB), which is used to fund regional development and governance (Suhartono & Yeheskiel, 2022). To encourage fiscal decentralization, local governments are required to increase tax revenues as a form of financial independence (Tulungen et al., 2024), so that regions have full control over the management of their own sources of revenue (Fahrizal & Bintoro, 2022). Madiun Regency, as one of the regions that seeks to reduce dependence on central transfer funds, is required to be more innovative in exploring the potential of regional taxes (A. I. Saputra & Limpato, 2021).

Important changes in the regional tax scheme have occurred since the promulgation of Law Number 1 of 2022 concerning Financial Relations between the Central Government and Regional Governments (HKPD), which introduced a tax *opsen* mechanism. *Opsen* is defined as the additional levy of taxes according to a certain percentage, which replaces the Revenue Sharing Fund (DBH) scheme which was previously used to transfer PKB revenue and Motor Vehicle Name Return Duty (BBNKB) from province to district/city. The PKB and BBNKB *opsen* rates are set at 66% of the tax payable (Article 83 of the HKPD Law), but this policy is *revenue neutral* because it is accompanied by a reduction in the basic PKB rate from a maximum of 2% to a maximum of 1.2% for the first vehicle ownership. The Directorate General of State Assets of the Ministry of Finance emphasized that the *opsen* is not a new tax burden, but a change in the profit-sharing mechanism alone (Naffa Alfadhila Aristine, 2024). Starting in January 2025, the results of the *opsen* collection will be directly deposited into the district/city Regional General Cash Account through a *split payment mechanism* when taxpayers pay PKB at SAMSAT, so that districts/cities no longer need to wait for the transfer process from the province.

Although technocratically designed to be neutral on the burden of taxpayers, this relatively recent policy has caused divided public opinion. Public misunderstandings about motor vehicle taxes continue and have the potential to result in miscommunication and taxpayer non-compliance (Mira et al., 2025). Previous research by Faradila et al. (2026) showed that the PKB opsen policy is effective in increasing PAD and regional fiscal independence, but can also cause the perception of an increase in tax burden in the community so that it requires transparency, socialization, and improvement of public services. Prawira & Yasa, (2025) research also found that external factors, such as government policies and the availability of tax incentives, have an impact on taxpayers' perception of PKB opsens. Meanwhile, Erasashanti et al. (2024) found that the willingness to pay motor vehicle taxes is influenced by external factors (modernization of the tax system and sanctions) and internal factors (tax knowledge, income levels, and taxpayer awareness).

This study uses attribution theory as an analytical framework. Theory was developed more systematically by Weiner (1985) through three main dimensions: *locus of causality* (whether the cause of an event originated in individuals or external factors), *stability* (whether the cause is fixed or changeable), and *controllability* (whether the cause is within the control of the individual or beyond his control). These three dimensions are used to understand how Madiun Regency taxpayers interpret the implementation of the PKB opsen whether it is seen as a consequence of government policies (external) or conditions that originate from themselves (internal), temporary or permanent, and the extent to which they feel able to control the impact.

This study presents novelty compared to previous research which generally focuses on the implementation of PKB policies from the perspective of the government, legal aspects, and regional revenues using a quantitative approach in metropolitan area (Ahmad & Negeri, 2025). This study uses a qualitative method that focuses on taxpayers while juxtaposing it with the views of Madiun Regency Bapenda employees (M. A. Saputra et al., 2025), so as to produce a more comprehensive and balanced picture.

Based on this description, the formulation of this research problem is: (1) whether Madiun Regency taxpayers are aware of the PKB opsen policy; (2) how taxpayers perceive the implementation of the policy; and (3) whether taxpayers understand the contribution of PKB opsens to increasing PAD. This study aims to determine the level of knowledge, perception, and understanding of Madiun Regency taxpayers towards the PKB opsen policy. Theoretically, this research is expected to enrich the study of regional taxation, especially the application of attribution theory in the context of motor vehicle tax compliance. Practically, these findings are useful as evaluation materials for Bapenda in improving socialization and services, as a source of information for taxpayers, and as a reference for academics and researchers in the future.

B. METHOD

This study uses a qualitative approach with a case study method. Sugiyono, (2023) states that qualitative research is based on the philosophy of postpositivism and is used to research the natural condition of objects, where the researcher plays a key role as a key instrument and the results of his research emphasize meaning rather than generalization. This approach was chosen because the research emphasizes the understanding, evaluation, and reaction of taxpayers to the PKB opsen policy in practice, not just the achievement of tax revenue (Cresswell, 2009).

The research was carried out at the Regional Revenue Agency (Bapenda) of Madiun Regency which is located at Jalan Alun-Alun Utara Number 4, Caruban, East Java, for five months (March-July 2026). The selection of the location is based on the direct role of Bapenda in the collection and administration of PKB opsens, data accessibility, and its relevance as a region that implements the opsen policy since the beginning of its implementation.

Primary data was collected through direct observation and in-depth interviews with two categories of informants: motor vehicle taxpayers and Bapenda employees. The *purposive sampling technique* was used with the criteria of taxpayer informants: (1) having a motor vehicle registered in Madiun Regency; (2) have paid the PKB after the effective of the opsen since January 2025; and (3) willing to provide open information. The criteria for Bapenda

informants are employees who directly handle PKB services and understand the technicalities of the opsen policy. The total number of informants is seven people, consisting of six taxpayers and one employee of the Madiun Regency Bapenda. Secondary data was obtained from regulatory documents (Law Number 1 of 2022, Madiun Regency Regional Regulation Number 1 of 2024), regional revenue realization reports for 2020–2025, data on the number of registered motor vehicles, and relevant previous research.

The data collection technique used non-participant observations in the Bapenda service environment, semi-structured interviews with an average duration of sixty minutes recorded and transcribed verbatim, as well as documentation studies on regulations and tax realization data. The data analysis adopts the interactive model of Miles et al. (2014) which consists of data condensation, data presentation, and conclusion-extraction/verification. The validity of the data was tested through source triangulation (comparing information of taxpayers and Bapenda employees) and technical triangulation (interviews, observations, and document studies). The case analysis was carried out by systematically linking the findings with the three dimensions of Weiner's (1985) attribution theory: *locus of control*, *stability*, and *controllability*. Conclusions are drawn inductively, building on generalizations from specific facts found in the field.

C. RESULTS AND DISCUSSIONS

Realization of Regional Taxes and PKB Opsen Contributions

The realization of regional tax revenue in Madiun Regency for the 2020-2025 period shows a trend that continues to increase and always exceeds the target, except in 2024 (95.94%). In 2025, the regional tax revenue target will increase significantly from IDR 357,506,913,326 (2024) to IDR 438,320,931,137, and has been successfully realized by IDR 448,251,741,818 or 102.27%. This achievement is encouraged, among other things, by the implementation of the PKB opsen and the BBNKB opsen as a new source of revenue from 2025.

Table 1. Realization of PKB Opsen and BBNKB Opsen in Madiun Regency in 2025 (*unaudited*)

Types of Levy	Target (Rp)	Realization (Rp)	Percentage
Opsen PKB	50.401.777.809	49.675.480.250	98,56%
Opsen BBNKB	15.283.333.360	15.511.489.700	101,49%

Source: Regional Revenue Realization Data of Bapenda Madiun Regency, processed (2026).

The realization of the PKB opsen did not reach 100% not because of the low real revenue, but because the target in the APBD Amendment still uses the initial target, because the results of the simulation of potential revenue from the East Java Provincial Bapenda were only submitted after the revised budget was passed. Combined, the revenue of the two types of opsens reached around IDR 65.19 billion, with PKB opsens being the largest contributor to PAD in Madiun Regency, outperforming BPHTB and PBJT for electricity.

The six taxpayer informants come from different work backgrounds of traders, RT chairmen, casual workers, and housewives and most of them have been motor vehicle taxpayers for more than five years, so they have experience in paying taxes both before and after the opsen is enforced.

Low Taxpayer Knowledge of PKB Opsens

The most prominent finding is the low understanding of taxpayers on the terms and substance of the PKB opsen. Five out of six informants admitted that they had never heard of the term, even after the policy had been in place for about a year and a half. Only one informant claimed to have heard the term but did not understand its meaning. This ignorance is consistent with the findings of Dharma (2025) that low tax literacy is a common obstacle to the implementation of regional tax policies, as well as the view of M. A. Saputra et al. (2025) that the PKB opsen still requires more intensive socialization and education.

This low literacy is closely related to the lack of socialization. Almost all informants stated that they had never received an official explanation about the PKB opsen, in line with Milleani (2022) findings that tax socialization affects the compliance of motor vehicle taxpayers. Interestingly, one of the informants revealed that citizen forums such as social gatherings have

the potential to be an alternative channel for disseminating information when formal government socialization is still limited.

Variations in Perception of Tax Burden

Although the opsen policy is designed to be *revenue neutral* through a reduction in the principal rate, the results of the interviews show that the perception of taxpayers is not uniform and is not entirely in line with the objectives of the policy. Some informants believe that their vehicle taxes are rising and feel burdened, while other informants consider the amount to be relatively fixed and attribute the variation that occurs to the age of the vehicle, not to the opsen policy. One of the informants even attributed the increase he felt to a change in the payment mechanism (from being deposited to being paid independently), not to the substance of the policy. This variation shows that taxpayers tend to be unable to separate the impact of opsens from other factors that also affect the amount of tax, such as inflation of the price of necessities and the selling value of vehicles, conditions that are in line with the findings of Prawira & Yasa (2025) that in the early stages of the implementation of opsens, taxpayers tend to assess policies as a worrying new burden.

Factors Driving Taxpayer Compliance

Despite low policy understanding, all informants stated that they still pay motor vehicle taxes on time. There are three main patterns of reasons: (1) normative awareness as a citizen who is obliged to pay taxes; (2) practical considerations to avoid obstacles when raiding vehicles on the road; and (3) economic considerations, namely maintaining a high selling value of vehicles with active taxes. Some informants also expressed a willingness to pay more as long as the benefits are felt directly, for example for road repairs and development. This pattern is in line with the findings of Sa'diyah et al. (2021) that taxpayer awareness has a positive and significant effect on compliance even in policy situations full of uncertainty.

Perspective of Bapenda Officers

Interviews with employees of the Billing Subdivision of the Madiun Regency Bapenda revealed that there is a widespread misunderstanding in the community regarding the figure of 66% of the opsen, which is often thought to be an increase of 66% from the previous bill, when in fact it is calculated from the tax principal whose rate has been derived from a mistake that was also highlighted by Saptono (2025). PKB and BBNKB opsens are *official assessments*, so that the Regional Tax Determination Letter is only issued when the payment is made; as a result, the PKB receivables recorded in the audited financial statements are very small even though the real compliance in the field has not reached one hundred percent. The level of compliance with the PKB is said to be around 75%, far below the compliance of the UN which reaches 94%. Bapenda employees also emphasized that the role of the Regency Bapenda is passive in socialization because the authority of data and the intensification of collection is fully in the hands of the East Java Provincial Bapenda, with a *cost sharing* and *role sharing* scheme of about 1% of the predicted achievement of the opsen to support joint activities.

Analysis through Weiner's Attribution Theory

In the *locus of control* dimension, some informants make external attribution by placing the cause of the tax increase on government policy, while other informants make internal attribution by attributing the amount of tax to factors inherent in the vehicle itself (vehicle age) or to changes in payment mechanisms. This variation of attribution confirms that taxpayers' perceptions are greatly influenced by the information they receive, which in the context of this study is still very limited.

In the *stability dimension*, the findings show that the inability of taxpayers to separate the impact of opsens from other dynamic factors (increase in the price of needs, changes in the selling value of vehicles) indicates that this policy has not been seen as a stable and predictable phenomenon. This condition is still felt by some informants even though the policy has been running for more than a year, showing that the taxpayer adaptation process is highly dependent on the availability of adequate socialization.

In the *controllability* dimension, all informants do not show control over the setting of the opsen policy itself, but still show full control over personal decisions to pay taxes on time. These findings explain why the compliance of Madiun Regency taxpayers remains high even though policy literacy is very low: the control that taxpayers have over payment decisions that are sourced from citizenship norms and practical considerations can replace the role of policy understanding as a driver of compliance. This pattern differs from the common assumptions in motor vehicle tax compliance studies that emphasize taxpayer knowledge as the main determinant (Cendana & Pradana, 2021; Erasashanti et al., 2024; Karlina & Ethika, 2020), and is one of the novelties offered by this research. The interaction between external factors (administrative and law enforcement pressures) and internal factors (citizenship norms) produces a pattern that researchers call *pragmatic* compliance that is not born from a deep understanding of the PKB opsen mechanism, but from a combination of normative awareness and external situational pressures.

The results of the triangulation between taxpayer data, Bapenda employee information, and documentation data showed two patterns. The common point can be seen in the socialization aspect that has not touched the community directly, as well as in the high realization data of the PKB opsen in 2025 (98.56% of the target), which empirically confirms the statement of Bapenda employees that the PKB opsen is the largest contributor to PAD. The most prominent point of difference lies in the perception of whether or not there is an increase in the tax burden: some taxpayers believe that their taxes are increasing, while the official explanation asserts that the opsen is designed not to add to the real burden because the basic rate has been lowered at the same time. This difference does not indicate that one party is wrong, but rather indicates a gap in policy communication, where a computationally neutral technocratic design has not been successfully translated into an accurate public understanding reinforces the importance of Faradila et al. (2026) recommendation that transparency, socialization, and improvement of public services are the key to the success of the opsen policy in the future.

D. CONCLUSIONS

This study shows that the level of knowledge of motor vehicle taxpayers in Madiun Regency regarding the PKB opsen policy is still relatively low, mainly due to the limited socialization of both the Madiun Regency Bapenda and the East Java Provincial Bapenda, considering that the authority of data and PKB collection management is at the provincial level so that the role of the district in socialization is passive. Taxpayers' perceptions of the implementation of the PKB opsen show differences between individuals, which are mostly influenced by external factors in the form of limited information, rather than by a complete understanding of the opsen calculation mechanism which is actually designed to be *revenue neutral*. Despite low policy understanding, the level of compliance of taxpayers in paying motor vehicle taxes remains high, driven by awareness of obligations as citizens and practical considerations, not by policy literacy itself. Most taxpayers are also not aware that the PKB opsen makes a big contribution to the PAD of Madiun Regency, which in 2025 will reach around IDR 65.19 billion and is the largest contributor to PAD. This finding expands Weiner (1985) attribution theory in the context of regional taxes by showing that the *controllability* dimension, namely personal control over the decision to comply, can replace the role of substantive understanding of policy as a driver of tax compliance, as well as reveal the communication gap between technocratically neutral policy designs and public perceptions that are still colored by misunderstandings.

E. SUGGESTIONS

The Madiun Regency Bapenda and the East Java Provincial Bapenda are advised to increase the socialization of PKB opsens not only through formal activities and social media, but also take advantage of community forums such as RT/RW meetings so that information is more easily received by taxpayers, as well as submit the results of the simulation of potential opsen receipts to the district government early before the preparation of the APBD Amendment so that the revenue target can be set more accurately. Taxpayers are advised to be more active in seeking information about motor vehicle tax policies through SAMSAT or official government media so

that it is not easy to misinterpret changes in tax amounts. Further research is suggested to involve a larger number of informants with a wider area coverage, compare taxpayer perceptions in several districts/cities, or use a quantitative approach to test the relationship between taxpayers' knowledge, perception, and compliance with the PKB opsen.

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