

Digital Market, Unequal Access: Legal Challenges For Consumers With Disabilities In Indonesia's E-Marketplace

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Abstract

*E-marketplaces provide broader access to goods and services, including for consumers with disabilities. However, many e-marketplace interfaces remain inaccessible and may perpetuate discrimination. This study examines the legal protection of consumers with disabilities in e-marketplaces and formulates an inclusive e-marketplace concept for Indonesia. Using a normative legal approach with comparative law analysis, the study finds that existing regulations only provide general consumer protection norms and lack specific accessibility standards for e-marketplace platforms. The proposed inclusive e-marketplace model is divided based on disability types. For consumers with physical and sensory disabilities, inclusivity is achieved through mandatory accessibility standards based on the Web Content Accessibility Guidelines (WCAG) 2.1 Level AA, supported by supervision and law enforcement. For consumers with intellectual and mental disabilities, inclusivity is realized through assistive features that shift the paradigm from substituted decision-making to supported decision-making. This concept aligns with Article 12(2) of the Convention on the Rights of Persons with Disabilities, which guarantees equal legal capacity for persons with disabilities in all aspects of life. The framework integrates enforceable WCAG compliance and accountable supported decision-making with the Islamic legal principles of *ahliyyah*, *maslahah*, *justice*, *prevention of harm*, and *hifz al-mal*. Therefore, inclusive e-marketplaces can ensure equal participation and protection for all consumers with disabilities.*

Keywords: *E-Marketplace, Inclusive, People With Disabilities, Consumer Protection, Legal Comparison.*

Abstrak

E-marketplace menyediakan akses yang lebih luas terhadap barang dan jasa, termasuk bagi konsumen dengan disabilitas. Namun, banyak antarmuka e-marketplace tetap tidak dapat diakses dan dapat melanggengkan diskriminasi. Studi ini menelaah perlindungan hukum bagi konsumen dengan disabilitas di e-marketplace dan merumuskan konsep e-marketplace inklusif untuk Indonesia. Dengan menggunakan pendekatan hukum normatif dengan analisis hukum komparatif, studi ini menemukan

bahwa regulasi yang ada hanya menyediakan norma perlindungan konsumen umum dan kurang memiliki standar aksesibilitas khusus untuk platform e-marketplace. Model e-marketplace inklusif yang diusulkan dibagi berdasarkan jenis disabilitas. Bagi konsumen dengan disabilitas fisik dan sensorik, inklusivitas dicapai melalui standar aksesibilitas wajib berdasarkan Web Content Accessibility Guidelines (WCAG) 2.1 Level AA, yang didukung oleh pengawasan dan penegakan hukum. Bagi konsumen dengan disabilitas intelektual dan mental, inklusivitas diwujudkan melalui fitur bantu yang menggeser paradigma dari pengambilan keputusan substitusi menjadi pengambilan keputusan yang didukung. Konsep ini sejalan dengan Pasal 12(2) Konvensi Hak Penyandang Disabilitas, yang menjamin kapasitas hukum yang setara bagi penyandang disabilitas dalam semua aspek kehidupan. Kerangka kerja ini mengintegrasikan kepatuhan WCAG yang dapat ditegakkan dan pengambilan keputusan yang didukung secara akuntabel dengan prinsip hukum Islam seperti ahliyyah, maslahah, keadilan, pencegahan bahaya, dan hifz al-mal. Oleh karena itu, pasar elektronik inklusif dapat memastikan partisipasi dan perlindungan yang setara bagi semua konsumen penyandang disabilitas.

Kata Kunci: E-Marketplace, Inklusif, Penyandang Disabilitas, Perlindungan Konsumen, Perbandingan Hukum.

INTRODUCTION

The use of information and communication technology has driven the emergence of various electronic commerce (e-commerce) platform.¹ An electronic marketplace (e-marketplace) is a component of e-commerce that plays a central role in connecting businesses and consumers,² thereby creating efficiency in transactions.³ E-marketplaces function not only as online storefronts but also as ecosystems that integrate payment systems, logistics, and even business reputation rating features. E-marketplaces consolidate these various functions, which

¹ Xiaoshan Yang et al., “ICT-Empowered Rural e-Commerce Development in China: An Adaptive Structuration Perspective,” *International Journal of Technology Management* 95, no. 1/2 (2024): 90–119, <https://doi.org/10.1504/ijtm.2024.10062290>; Lina Anatan and Nur, “Micro, Small, and Medium Enterprises’ Readiness for Digital Transformation in Indonesia,” *Economies* 11, no. 6 (May 26, 2023): 156, <https://doi.org/10.3390/economies11060156>.

² Jose Alejandro Cano et al., “A Bibliometric Analysis and Systematic Review on E-Marketplaces, Open Innovation, and Sustainability,” *Sustainability* 14, no. 9 (2022): 1–42, <https://doi.org/10.3390/su14095456>; Sfenrianto Sfenrianto, Tendi Wijaya, and Gunawan Wang, “Assessing the Buyer Trust and Satisfaction Factors in the E-Marketplace,” *Journal of Theoretical and Applied Electronic Commerce Research* 13, no. 2 (2018): 43–57, <https://doi.org/10.4067/S0718-18762018000200105>.

³ Jun Li et al., “The Fulfillment Service in Online Marketplaces,” *European Journal of Operational Research* 315, no. 3 (June 2024): 1139–52, <https://doi.org/10.1016/J.EJOR.2024.01.003>.

were previously dispersed among several conventional economic actors.⁴

E-marketplaces offer a number of advantages for consumers, including easy access to a wide variety of products,⁵ quick price comparisons, and flexibility in terms of time and location for transactions.⁶ In addition, consumers can also obtain information regarding consumer reviews and business track records, as well as reduce transaction costs and information search costs.⁷ The rapid transformation of digital commerce also demands adaptive legal reform to prevent structural discrimination in digital platforms.⁸

E-marketplaces provide businesses with a relatively ready-to-use digital infrastructure for marketing products without requiring significant investment in the construction of physical stores⁹ or independent information technology systems. E-marketplaces reach a

⁴ Mikko Hänninen, Lasse Mitronen, and Stephen K. Kwan, "Multi-Sided Marketplaces and the Transformation of Retail: A Service Systems Perspective," *Journal of Retailing and Consumer Services* 49, no. May (2019): 380–88, <https://doi.org/10.1016/j.jretconser.2019.04.015>.

⁵ Chenggang Wang et al., "The Influence of Consumer Perception on Purchase Intention: Evidence from Cross-Border E-Commerce Platforms," *Heliyon* 9, no. 11 (November 2023): e21617, <https://doi.org/10.1016/J.HELIYON.2023.E21617>; Lifang Peng, Na Zhang, and Ling Huang, "How the Source Dynamism of Streamers Affects Purchase Intention in Live Streaming E-Commerce: Considering the Moderating Effect of Chinese Consumers' Gender," *Journal of Retailing and Consumer Services* 81 (November 2024): 103949, <https://doi.org/10.1016/J.JRETCONSER.2024.103949>.

⁶ Sefa Emre Yilmazel, "Online Purchasing Model for PwD (People with Disabilities) Consumers : Pre and Post Disability Behaviors," *SAGE Open* 15, no. 2 (2025): 1–16, <https://doi.org/10.1177/21582440251340868>; Xiayu Chen, Junya Shen, and Shaobo Wei, "What Reduces Product Uncertainty in Live Streaming E-Commerce? From a Signal Consistency Perspective," *Journal of Retailing and Consumer Services* 74 (September 2023): 103441, <https://doi.org/10.1016/J.JRETCONSER.2023.103441>.

⁷ Quynh Huong Do, Thai Young Kim, and Xueqin Wang, "Effects of Logistics Service Quality and Price Fairness on Customer Repurchase Intention: The Moderating Role of Cross-Border e-Commerce Experiences," *Journal of Retailing and Consumer Services* 70 (January 2023): 103165, <https://doi.org/10.1016/J.JRETCONSER.2022.103165>.

⁸ Azhar Azhar, "Islamic Law Reform in Indonesia from the Perspective of Maqāṣid Al-Sharī'ah: Kerinci's Intellectual Views," *Samarah: Jurnal Hukum Keluarga Dan Hukum Islam* 8, no. 2 (May 11, 2024): 750, <https://doi.org/10.22373/sjhk.v8i2.15051>.

⁹ Cheong Kim, Francis Joseph Costello, and Kun Chang Lee, "The Unobserved Heterogeneous Influence of Gamification and Novelty-Seeking Traits on Consumers' Repurchase Intention in the Omnichannel Retailing," *Frontiers in Psychology* 11 (2020): 1–21, <https://doi.org/10.3389/fpsyg.2020.01664>.

broader market and transcend geographical boundaries,¹⁰ supported by promotional features, consumer data analytics, and logistics service integration.¹¹ In this context, e-marketplaces create economic efficiencies as well as opportunities to enhance competitiveness, both for large businesses and micro, small, and medium-sized enterprises (MSMEs),¹² which has implications for national economic growth.¹³

Transactions via e-marketplaces offer many advantages, but they still have drawbacks such as information asymmetry,¹⁴ as well as reviews that can be manipulated¹⁵. Specifically for consumers with disabilities, e-marketplaces fundamentally still pose problems stemming from inaccessible interface design, namely navigation that is incompatible with screen readers¹⁶, colors and contrast that make it difficult to use,¹⁷ menu structures that are illogical for visually impaired users, the use of

¹⁰ Maurizio Dallocchio et al., “The Role of Digitalization in Cross-Border E-Commerce Performance of Italian SMEs,” *Sustainability* 16, no. 2 (2024): 1–17, <https://doi.org/10.3390/su16020508>.

¹¹ Rui Sousa et al., “How to Serve Online Consumers in Rural Markets: Evidence-Based Recommendations,” *Business Horizons* 63, no. 3 (May 2020): 351–62, <https://doi.org/10.1016/J.BUSHOR.2020.01.007>.

¹² Husain Alasbool, Allam Hamdan, and Amir Dhia, “The Adoption and Impact of E-Commerce on the Sustainability of SMEs,” in *Business Development via AI and Digitalization*, 2024, 525–31, https://doi.org/10.1007/978-3-031-62102-4_44.

¹³ Sina Mirzaye and Muhammad Mohiuddin, “Digital Transformation in International Trade: Opportunities, Challenges, and Policy Implications,” *Journal of Risk and Financial Management* 18, no. 8 (2025): 1–29, <https://doi.org/10.3390/jrfm18080421>.

¹⁴ Yao Tang, Yannan Zhang, and Xianzhang Ning, “Uncertainty in the Platform Market: The Information Asymmetry Perspective,” *Computers in Human Behavior* 148 (November 2023): 107918, <https://doi.org/10.1016/J.CHB.2023.107918>.

¹⁵ Lirong Chen et al., “Detection of Fake Reviews: Analysis of Sellers’ Manipulation Behavior,” *Sustainability* 11, no. 17 (2019): 4802, <https://doi.org/10.3390/su11174802>; L. Jean Harrison-Walker and Ying Jiang, “Suspicion of Online Product Reviews as Fake: Cues and Consequences,” *Journal of Business Research* 160 (May 2023): 113780, <https://doi.org/10.1016/J.JBUSRES.2023.113780>.

¹⁶ Nikolaos Droutsas et al., “Web Accessibility Barriers and Their Cross-Disability Impact in ESystems: A Scoping Review,” *Computer Standards & Interfaces* 92 (March 2025): 103923, <https://doi.org/10.1016/J.CSI.2024.103923>; Ann Leahy and Delia Ferri, “Barriers to Cultural Participation by People with Disabilities in Europe: A Study across 28 Countries,” *Disability and Society* 39, no. 10 (2024): 2465–87, <https://doi.org/10.1080/09687599.2023.2222898>.

¹⁷ Patricia Acosta-Vargas et al., “Accessibility Challenges of E-Commerce Websites,” *PeerJ Computer Science* 8 (2022): 1–21, <https://doi.org/10.7717/PEERJ-CS.891>.

CAPTCHA without alternative options¹⁸, and video content without subtitles or sign language interpretation. Additionally, the checkout process is not inclusive for consumers with disabilities because it relies on One-Time Password (OTP) verification¹⁹ or Short Message Service (SMS), which poses difficulties for some users with disabilities. As a result, consumers with disabilities are hindered from accessing product information and placing orders, particularly those with visual, hearing, intellectual, or psychosocial impairments.²⁰

Consumer protection in digital platforms should prioritize public benefit and the prevention of harm.²¹ Accessibility barriers for consumers with disabilities on e-marketplaces exist in many countries, including Indonesia.²² Research conducted on the Shopee Indonesia e-marketplace using the Web Content Accessibility Guidelines (WCAG) as a reference still identified several accessibility barriers that hinder consumers with disabilities, particularly the visually impaired.²³ Another study by Sasana Inklusif and the Disability Advocacy Movement (SIGAB) of 160 people with disabilities in Jakarta, South Sulawesi, Bali, and Yogyakarta, showed that 68 respondents faced difficulties accessing e-marketplaces, and 59 respondents experienced visual sensory barriers

¹⁸ P. L. Chithra and K. Sathya, "Scanning-to-Speech Challenge-Response Authentication Test for Visually Impaired," *Computers & Electrical Engineering* 92 (June 2021): 107133, <https://doi.org/10.1016/J.COMPELECENG.2021.107133>.

¹⁹ Steven Furnell, Kirsi Helkala, and Naomi Woods, "Accessible Authentication: Assessing the Applicability for Users with Disabilities," *Computers & Security* 113 (February 2022): 102561, <https://doi.org/10.1016/J.COSE.2021.102561>.

²⁰ Kate Annett Hitchcock and Yingjiao Xu, "Shopping and Virtual Communities for Consumers with Physical Disabilities," *International Journal of Consumer Studies* 39, no. 2 (2015): 136–44, <https://doi.org/10.1111/ijcs.12161>; Yilmazel, "Online Purchasing Model for PwD (People with Disabilities) Consumers : Pre and Post Disability Behaviors."

²¹ Muhammad Harfin Zuhdi and Mohamad Abdun Nasir, "Al-Mashlahah and Reinterpretation of Islamic Law in Contemporary Context," *Samarah: Jurnal Hukum Keluarga Dan Hukum Islam* 8, no. 3 (October 17, 2024): 1818, <https://doi.org/10.22373/sjhk.v8i3.24918>.

²² Hanny Hafiar et al., "Accessibility to E-Commerce Websites for People with Disability in Indonesia," *Communicatus: Jurnal Ilmu Komunikasi* 7, no. 1 (2023): 65–84, <https://doi.org/10.15575/cjik.v7i1.25406>.

²³ Chiquitita Amalia Raharjo et al., "Analisis Aksesibilitas Website Shopee Indonesia Menggunakan Pedoman Web Content Accessibility Guidelines," *Comdent: Communication Student Journal* 1, no. 2 (2023): 340–54, <https://doi.org/10.24198/comdent.v1i2.54287>.

that made it difficult to navigate within e-marketplace applications.²⁴ The Indonesian National Consumer Protection Agency (BPKN) also acknowledges that e-marketplace access is not yet disability-friendly and recommends that e-marketplace operators develop applications that are accessible to consumers with disabilities.²⁵

The rights of persons with disabilities have been internationally recognized through United Nations General Assembly Resolution No. A/61/106 regarding the Convention on the Rights of Persons with Disabilities (CRPD). The CRPD aims to promote, protect, and ensure the fulfillment of the rights of persons with disabilities²⁶ and serves as a key instrument in the human rights of persons with disabilities.²⁷ Article 3(c) of the CRPD establishes the general principle regarding persons with disabilities, namely full and effective participation and inclusion in society.²⁸ Furthermore, in the realm of consumer protection, the United Nations Guidelines for Consumer Protection (UNGCP) also require that the level of protection for e-commerce consumers be no lower than that for other forms of commerce and call for special attention to vulnerable consumers.²⁹

Existing studies predominantly measure technical accessibility barriers or discuss general consumer and disability rights. They do not explain how a binding accessibility duty should be allocated among e-marketplace operators, regulators, sellers, support persons, and consumers; nor do they reconcile electronic-contract validity and

²⁴ Cheta Nilawaty, "Layanan Jual Beli Online Yang Tidak Terakses Merugikan Konsumen Disabilitas," *Tempo.co*, 2021.

²⁵ BPKN BPKN, "BPKN Tekankan Pentingnya Aksesibilitas Konsumen Disabilitas Sektor E-Commerce Dan Transportasi," *Badan Perlindungan Konsumen Nasional RI*, 2022.

²⁶ Dorien Claessen et al., "Bringing Human Rights Home: Access to Justice and the Role of Local Actors Implementing the United Nations Convention on the Rights of Persons with Disabilities," *Journal of Human Rights Practice* 16, no. 2 (2023): 554–71, <https://doi.org/10.1093/jhuman/huad053>.

²⁷ Siri H. Eriksen, Robyn Grøndahl, and Ann Marit Sæbønes, "On CRDPs and CRPD: Why the Rights of People with Disabilities Are Crucial for Understanding Climate-Resilient Development Pathways," *The Lancet Planetary Health* 5, no. 12 (2021): e929–39, [https://doi.org/10.1016/S2542-5196\(21\)00233-3](https://doi.org/10.1016/S2542-5196(21)00233-3).

²⁸ Paul Slater et al., "Public Attitudes to the Rights and Community Inclusion of People with Intellectual Disabilities: A Transnational Study," *Research in Developmental Disabilities* 105 (2020): 1–10, <https://doi.org/10.1016/j.ridd.2020.103754>.

²⁹ UNCTAD UNCTAD, "Consumer Protection in Electronic Commerce," UNCTAD, 2017.

supported decision-making with Islamic doctrines of legal capacity and protective assistance. This leaves a distinct doctrinal and institutional gap between recognition of accessibility as a right and its enforceable realization in private digital markets.

Accordingly, this study asks: (1) to what extent is Indonesian e-marketplace law compatible with the accessibility, equality, and legal-capacity guarantees of the CRPD; and (2) what regulatory architecture can make e-marketplaces accessible while preserving the will, preferences, property, and dignity of consumers with disabilities? Its originality lies in an integrated model that links a technical baseline (WCAG), public and private enforcement, supported decision-making, and Islamic legal principles. Rather than importing foreign rules wholesale, the comparison identifies regulatory functions that can be adapted to Indonesia: a binding benchmark, ex ante audit, accessible complaint channels, proportionate sanctions, and safeguards for voluntary support.

RESEARCH METHOD

This study employs a normative legal methodology³⁰, to identify, interpret, and systematize the rules governing consumers with disabilities in Indonesian e-marketplaces. The primary materials comprise the 1945 Constitution, the Indonesian Civil Code, Law No. 8 of 1999 on Consumer Protection, Law No. 19 of 2011 ratifying the CRPD, Law No. 8 of 2016 on Persons with Disabilities, the Electronic Information and Transactions legislation and its amendments, and Government Regulation No. 80 of 2019 on Trading Through Electronic Systems. International materials include Articles 9 and 12 CRPD, the CRPD Committee's General Comment No. 1, the United Nations Guidelines for Consumer Protection, and WCAG 2.1/2.2. Secondary legal and interdisciplinary scholarship is used to test the coherence and practical implications of the doctrinal interpretation.

The comparative-law component is functional and problem-oriented. The European Union was selected because Directive (EU) 2019/882 expressly subjects e-commerce services to harmonized accessibility requirements, while the United States illustrates rights-based enforcement under disability law and the use of WCAG as a

³⁰ Tom R. Tyler, "Methodology in Legal Research," *Utrecht Law Review* (Igitur, Utrecht Publishing and Archiving Services, 2017), <https://doi.org/10.18352/ulr.410>; Stefan Theil, "Carefully Tailored: Doctrinal Methods and Empirical Contributions," *Oxford Journal of Legal Studies* XX, no. XX (2025): 1–29, <https://doi.org/10.1093/ojls/gqaf029>.

compliance benchmark in regulatory and settlement practice. The comparison is limited to five functions: (i) scope of duty, (ii) technical benchmark, (iii) conformity assessment and monitoring, (iv) complaints and remedies, and (v) proportionality for economic actors. These jurisdictions are not treated as identical transplants; their functions are evaluated for compatibility with Indonesia's civil-law, consumer-protection, disability-rights, and institutional context.

Analysis proceeded in four stages: inventory and hierarchy of norms; interpretation of legal-capacity and accessibility provisions; functional comparison; and prescriptive synthesis. The synthesis was then evaluated through *maqasid al-shariah* and the Islamic concepts of *ahliyyah*, *wilayah*, *maslahah*, *adl*, *hifz al-mal*, *raf al-haraj*, and *la darar wa la dirar*. This final step tests whether the proposed model protects property and prevents exploitation while preserving autonomy and avoiding unnecessary hardship. The study is doctrinal and does not claim empirical measurement of platform compliance or user experience.

RESULTS AND DISCUSSION

Accessibility Guidelines Based on the Web Content Accessibility Guidelines (WCAG)

The development of e-marketplaces is transforming the global consumption landscape, but at the same time creating a new form of digital divide for people with disabilities.³¹ From a human rights perspective, access to e-marketplace platforms is no longer merely a technical issue, but an integral part of fulfilling the right to participate equally in economic and social life.³²

The international standard serving as a guideline for the accessibility of websites and applications for people with disabilities is WCAG, developed by the World Wide Web Consortium (W3C) and the Web Accessibility Initiative (WAI). WCAG makes the web, applications, and other technologies more inclusive for users with various disabilities, such as visual, hearing, motor, and cognitive

³¹ Mark Scanlan, "Reassessing the Disability Divide: Unequal Access as the World Is Pushed Online," *Universal Access in the Information Society* 21, no. 3 (August 2022): 725–35, <https://doi.org/10.1007/s10209-021-00803-5>.

³² Merten Reglitz, "The Socio-Economic Argument for the Human Right to Internet Access," *Politics, Philosophy & Economics* 22, no. 4 (November 2023): 441–69, <https://doi.org/10.1177/1470594X231167597>.

impairments.³³ WCAG is not a law, but rather a set of guidelines used globally to create web content that is accessible to people with disabilities.³⁴

The WCAG guidelines are based on four core accessibility principles: perceivable, operable, understandable, and robust.³⁵ The perceivable principle states that information or user interface components must be perceivable by all senses; for example, every product image must have alternative text (alt-text) that describes the product's function and characteristics.³⁶ The operable principle states that an application must be operable in various ways; for example, the application supports keyboard navigation and features large, touch-friendly buttons. The principle of understandability ensures that information and user interface operations are easy to understand and consistent, such as the use of simple language, clear instructions, and informative error messages. The principle of robustness ensures that the application is compatible with various assistive technologies; for example, the application supports screen readers and is compatible with various browsers and devices.

The most relevant and currently used WCAG standards for transactions on e-marketplace platforms are WCAG 2.1/2.2 Level AA.³⁷ WCAG 2.1 makes content more accessible to people with disabilities in the categories of blindness and low vision, deafness and hearing impairment, mobility impairment, speech impairment, light sensitivity, as well as some accommodations for learning disabilities and cognitive impairments.³⁸ WCAG 2.2 covers a wide range of disabilities, including visual, hearing, physical, speech, cognitive, language, learning, and neurological disabilities. WCAG 2.2 also makes web content more

³³ Youlan Xiu, "What Does Web Accessibility Look Like Under the ADA?: The Need for Regulatory Guidance in an E-Commerce World," *George Washington Law Review* 89, no. 2 (2021): 400–428.

³⁴ Sara Gartland et al., "The State of Web Accessibility for People with Cognitive Disabilities: A Rapid Evidence Assessment," *Behavioral Sciences* 12, no. 2 (2022): 1–25, <https://doi.org/10.3390/bs12020026>.

³⁵ W3C, "Introduction to Understanding WCAG 2.1," W3C Web Accessibility Initiative (WAI), 2025.

³⁶ Anatan and Nur, "Micro, Small, and Medium Enterprises' Readiness for Digital Transformation in Indonesia."

³⁷ Acosta-Vargas et al., "Accessibility Challenges of E-Commerce Websites."

³⁸ W3C W3C, "Web Content Accessibility Guidelines (WCAG) 2.1," W3C, 2018.

accessible to older adults experiencing changes in ability due to aging.³⁹ WCAG 2.2 does not replace WCAG 2.1, but WCAG 2.2 is an evolution of WCAG 2.1, meaning that a website or application that complies with WCAG 2.2 is at least as accessible as one that complies with WCAG 2.1.

Comparative Regulatory Lessons for Indonesia

The functional comparison shows why voluntary reference to WCAG is insufficient. Directive (EU) 2019/882 brings e-commerce services within a binding accessibility regime and connects accessibility requirements to conformity, market surveillance, complaints, and enforcement. In the United States, the legal routes differ by sector and title of the Americans with Disabilities Act, but regulatory and settlement practice demonstrates the practical value of an express technical benchmark, accessibility coordinators, combined automated and manual testing, user testing, training, grievance procedures, and time-bound remediation. The transferable lesson is therefore institutional rather than textual: accessibility becomes enforceable when a technical standard is connected to duty holders, evidence, monitoring, remediation, and sanctions.

Table 1. Comparison of E-Commerce Accessibility Regulation Approaches for Persons with Disabilities: European Union, United States, and Indonesia

Categories of Persons with Disabilities	European Union	United States	Adaptation proposed for Indonesia
Scope	E-commerce services expressly covered by Directive (EU) 2019/882.	Sector- and title-specific disability-law duties.	Large e-marketplace operators as primary duty holders; proportional duties for MSMEs.
Benchmark	Harmonized accessibility requirements.	WCAG frequently used as a concrete compliance benchmark.	WCAG 2.1 Level AA as the statutory minimum, with an updating mechanism.
Verification	Conformity and market-surveillance structure.	Audits, testing, coordinators, and remediation plans in	Annual independent audits, self-assessment, user testing, and public

³⁹ W3C W3C, “Web Content Accessibility Guidelines (WCAG) 2.2,” W3C, 2023.

Categories of Persons with Disabilities	European Union	United States	Adaptation proposed for Indonesia
		regulatory practice.	accessibility statements.
Enforcement	Complaints, corrective action, and effective penalties.	Administrative enforcement, settlements, and private litigation depending on the legal route.	Accessible complaints, correction orders, administrative sanctions, civil remedies, and representative actions.

Customer Protection for People with Disabilities on E-Marketplace Platforms in Indonesia

The constitutional foundation for persons with disabilities in Indonesia is guaranteed in the Constitution of the Republic of Indonesia, namely the 1945 Constitution (UUD 1945). Article 28H paragraph (2) and Article 28I paragraph (2) of the 1945 Constitution guarantee the right to facilities and special treatment to achieve equality and justice, including digital services in e-marketplaces. This is in line with Article 1 of the CRPD to ensure the full and equal fulfillment of all human rights for all persons with disabilities. As implementing regulations for the rights of consumers with disabilities in e-marketplace transactions, Law No. 8 of 1999 and Law No. 8 of 2016 have been issued.

The right to accessibility for persons with disabilities on e-marketplace platforms, within the context of consumer protection, is enshrined in Article 4 of Law No. 8 of 1999, which governs consumer rights. The consumer rights outlined in Article 4 of Law No. 8 of 1999 pertain to comfort, accurate, clear, and honest information, as well as being treated fairly, honestly, and without discrimination. As for the obligations of business operators, consumer accessibility rights are also emphasized in Article 7 of Law 8/1999, which requires business operators to act in good faith, provide accurate, clear, and honest information, and treat consumers fairly, honestly, and without discrimination. However, Law 8/1999 does not specifically mention digital accessibility rights for consumers with disabilities, but only defines general consumer rights, namely the right to comfort, information, and non-discrimination.

From a human right's legal perspective, Indonesia has ratified the CRPD through Law No. 19 of 2011, which was followed by Law No. 8 of 2016 as the legal basis for the legal protection of persons with

disabilities in Indonesia. Law 8/2016 shifts the legal paradigm regarding disability from a charity-based approach to a human rights-based approach, affirming the principles of non-discrimination, equality, accessibility, reasonable accommodation, and inclusivity as foundational principles. Article 1(1) of Law 8/2016 defines a person with a disability as any person who has long-term physical, intellectual, mental, and/or sensory limitations and who, in interacting with the environment, may face barriers and difficulties in fully and effectively participating with other citizens on the basis of equal rights.

Table 2. Types of Disabilities According to Law No. 8 of 2016

Catagories of Persons with Disabilities	Explanation	Protection Needs
Physical Disabilities	Impaired mobility, including amputation, flaccid or spastic paralysis, paraplegia, cerebral palsy (CP), stroke, leprosy, and dwarfism	Accessibility: easy navigation, controls that do not require complex motor skills, and compatibility with assistive devices.
Intellectual Disabilities	Impaired cognitive function due to below-average intelligence, including learning disabilities, intellectual disabilities, and Down syndrome	Accessibility: simple interface Cognitive: simple language, clear icons, multi-step confirmation Contracts: assisted consent, grace period
Mental Disabilities	Impaired cognitive, emotional, and behavioral functions, including: psychosocial conditions, including	Accessibility: Sensory adjustments, prevention of overstimulation

	schizophrenia, bipolar disorder, depression, anxiety, and personality disorders a. developmental disabilities that affect social interaction skills, including autism and ADHD	Cognitive: Prevention of persuasive design, decision-making pauses Contracts: Agreements with assistance as needed
Sensory Disabilities	Impairment of one or more of the five senses, including visual impairment, hearing impairment, and/or speech impairment	Accessibility: alternative text, captions, screen readers
Dual/Multiple Disabilities	A combination of more than one type of disability, such as physical, sensory, intellectual, or mental disabilities.	Accessibility: combined and adaptive Cognitive: customized Contract: flexible and supported

Pursuant to Article 4(2) of Law No. 8 of 2016, various types of disabilities may be experienced singly, in combination, or in multiple forms over an extended period, meaning that a person with a disability may have more than one type of disability. Law No. 8 of 2016 does not address accessibility in the digital space; therefore, Law No. 8 of 2016 cannot yet protect consumers with disabilities on e-marketplace platforms. This is based on Article 18 of Law No. 8 of 2016, which only covers access to public facilities and reasonable accommodations.

Accessibility for consumers with disabilities regarding information and transactions is also regulated under Law No. 11 of 2008, which stipulates that the right to accessibility applies to consumers with disabilities. This right stems from the obligation of electronic system operators to operate reliable, secure, and responsible systems, as well as

to meet minimum requirements that include the accessibility of electronic information. Additionally, electronic system operators are obligated to provide instructions in language or symbols that can be understood by consumers, including consumers with disabilities. At the implementation level, this provision requires the design of web interfaces for platforms and e-marketplaces including content and transaction flows to be accessible to all users, including the use of assistive technologies for people with disabilities. Law No. 11 of 2008 has normatively provided protection for consumers with disabilities; however, its implementation still requires specific regulations regarding the establishment of accessibility standards.

Specific regulations governing e-marketplaces in Indonesia are set forth in Regulation 80/2019. The right to accessibility for consumers with disabilities under Regulation 80/2019 is based on the obligation of business operators to provide accurate, clear, and truthful data or information. Furthermore, Regulation 80/2019 also stipulates that electronic offers must include information such as specifications, prices, and terms and conditions, including delivery details, which must be stated accurately, correctly, and honestly. Although Regulation 80/2019 normatively ensures accessibility to e-marketplace transactions for all consumers, it does not specifically address accessibility for consumers with disabilities. Compliance with accessibility requirements on e-marketplace platforms is, in practice, based on the voluntary participation of the e-marketplace platforms.

Consumer protection is essentially the fulfillment of consumer rights,⁴⁰ which comprehensively aims to create a fair, transparent, and safe market⁴¹ and to build market trust.⁴² Consumer protection for people with disabilities is an effort to fulfill and realize the rights of consumers with disabilities. A form of consumer protection for people with

⁴⁰ Deviana Yuanitasari, Hazar Kusmayanti, and Agus Suwandono, "A Comparison Study of Strict Liability Principles Implementation for the Product Liability within Indonesian Consumer Protection Law between Indonesia and United States of America Law," *Cogent Social Sciences* 9, no. 2 (December 2023): 1–12, <https://doi.org/10.1080/23311886.2023.2246748>.

⁴¹ I. Benöhr, "The United Nations Guidelines for Consumer Protection: Legal Implications and New Frontiers," *Journal of Consumer Policy* 43, no. 1 (March 2020): 105–24, <https://doi.org/10.1007/s10603-019-09443-y>.

⁴² Anja Rösner, Justus Haucap, and Ulrich Heimeshoff, "The Impact of Consumer Protection in the Digital Age: Evidence from the European Union," *International Journal of Industrial Organization* 73 (December 2020): 102585, <https://doi.org/10.1016/J.IJINDORG.2020.102585>.

disabilities on e-marketplace platforms is the fulfillment of accessibility rights, which, according to Law 8/2016, refers to the ease with which consumers with disabilities can achieve equality and equal opportunities in accessing e-marketplace platforms. Consumer protection in the digital economy era demands digital fairness standards aimed at protecting consumers from manipulative and unethical practices,⁴³ and relies on an information-based foundation that is, ensuring consumers are informed and empowered.⁴⁴

Law No. 8 of 1999, which serves as the legal basis for consumer protection in Indonesia, does not specifically address accessibility rights for consumers with disabilities. The consumer rights outlined in Law No. 8 of 1999 essentially cover general consumer rights applicable to all consumer transactions in general, without focusing on any specific type of transaction. In the context of e-marketplace transactions, the consumer rights in Law 8/1999 cannot be directly implemented to fulfill the accessibility rights of consumers with disabilities, as this requires specific regulations establishing technical standards for the accessibility of consumers with disabilities on e-marketplace platforms.

Consumer protection for people with disabilities cannot be achieved solely through the establishment of accessibility standards. To ensure accessibility for consumers with disabilities on e-marketplace platforms, this must be accompanied by effective and efficient oversight and enforcement. In the context of consumer protection, oversight and enforcement of accessibility compliance fall under the authority of the Ministry of Communication and Digital Affairs of the Republic of Indonesia (Komdigi), in coordination with the National Consumer Protection Agency (BPKN) and the Ministry of Trade of the Republic of Indonesia (Kemendag). Formal government oversight and enforcement are expected to ensure that accessibility requirements for consumers with disabilities are met on e-marketplace platforms. In addition to government oversight, ensuring compliance with e-marketplace accessibility requirements can be achieved through legal action initiated

⁴³ M. Namysłowska, “The Silent Death of EU Consumer Law and Its Resilient Revival: Reinventing Consumer Protection Against Unfair Digital Commercial Practices,” *Journal of Consumer Policy*, September 2025, <https://doi.org/10.1007/s10603-025-09590-5>.

⁴⁴ Mary Donnelly and Fidelma White, “Digital Content and Consumer Protection: An Empirical Study of Supplier Compliance with Consumer Information Obligations,” *Computer Law & Security Review* 35, no. 6 (November 2019): 105343, <https://doi.org/10.1016/J.CLSR.2019.105343>.

by consumer protection organizations or the government under Article 46 of Law No. 8 of 1999. Lawsuits filed by consumer protection organizations are essentially not claims for damages, but rather lawsuits filed to protect the general interests of consumers regarding the fulfillment of accessibility rights for consumers with disabilities.

The implementation of consumer protection for people with disabilities on e-marketplace platforms in Indonesia has not yet fully safeguarded the rights of consumers with disabilities. Normatively, Law 8/1999, Law 8/2016, the ITE Law, and Regulation 80/2019 have established the rights of consumers regarding accessibility for people with disabilities. However, their implementation still requires specific regulations regarding the establishment of technical accessibility standards, accompanied by oversight and law enforcement. Accessibility standards are necessary to ensure consistency across e-marketplace platforms, making it easier to assess compliance with accessibility rights in the context of oversight and enforcement. The absence of explicit and binding accessibility standards means that the protection of consumers with disabilities on e-marketplace platforms remains heavily dependent on the voluntary initiatives of business operators, which creates uncertainty regarding consumer protection.

Regulations on consumer protection for people with disabilities in Indonesia still reveal weaknesses in the legal framework, namely the existence of normative recognition of accessibility rights, yet there are no implementing regulations that establish binding technical standards enforceable against the private sector, particularly large e-marketplace operators. From a human rights law perspective, the failure to fulfill the accessibility rights of consumers with disabilities can be interpreted as a failure of the state to take appropriate and effective measures to remove foreseeable barriers,⁴⁵ as emphasized in Article 9 of the CRPD. Without standard accessibility regulations, effective oversight, and enforcement, the right to accessibility will remain merely a normative declaration. Based on this consideration, a revision of Law 8/1999 and Regulation 80/2019 is necessary to incorporate the dimension of digital accessibility as an inherent part of consumer protection and the protection of persons with disabilities. Furthermore, Law 8/1999 should ideally also explicitly

⁴⁵ Noelle Higgins, Delia Ferri, and Katie Donnellan, “Enhancing Access to Digital Culture for Vulnerable Groups: The Role of Public Authorities in Breaking Down Barriers,” *International Journal for the Semiotics of Law* 36, no. 5 (2023): 2087–2114, <https://doi.org/10.1007/s11196-022-09959-6>.

recognize consumers with disabilities as a vulnerable consumer group entitled to special protection.⁴⁶

The Concept of an Inclusive E-Marketplace for Consumers with Disabilities in Promoting Justice and Non-Discrimination

Accessibility barriers for consumers with disabilities on e-marketplace platforms, in the context of human rights, are not merely a matter of interface design, but rather a structural issue that touches upon the state's obligations⁴⁷ to guarantee the right to accessibility, equality, and full participation.⁴⁸ To address accessibility barriers for consumers with disabilities in Indonesia, two concepts for inclusive e-marketplaces are proposed, taking into account the diversity of disabilities.

First, an e-marketplace that is inclusive of people with physical and sensory disabilities. People with physical and sensory disabilities are those who experience impairments in one of their five senses, including the blind, the deaf, and the mute. Under Indonesian law, individuals with physical and sensory disabilities are legally competent to perform legal acts, whereby the legal acts they perform produce full legal consequences that are binding on the parties involved.

The legal framework for protecting consumers with disabilities on e-marketplace platforms in Indonesia is currently limited to general norms regarding consumer rights. To enhance legal protection for consumers with disabilities, consumer protection regulations are needed that explicitly incorporate accessibility obligations for e-marketplace platforms. Given the characteristics of the civil law system adopted by Indonesia, such regulations and their institutional framework must be established by law, setting a minimum accessibility standard of WCAG 2.1 Level AA. This is intended to provide legal certainty for e-marketplace platforms while serving as an objective benchmark for monitoring and enforcing compliance with accessibility requirements. From a legal perspective, compliance with the technical requirements of WCAG 2.1 Level AA can be positioned as a compliance standard; failure to meet these requirements may result in administrative or civil liability for e-marketplace platforms.

The inclusive e-marketplace model requires proactive supervision that does not depend solely on individual complaints. National regulation

⁴⁶ UNCTAD, "Consumer Protection Needs of Vulnerable and Disadvantaged Consumers in Connection with Public Utilities," UNCTAD, 2021.

⁴⁷ (Sohaib & Kang, 2017)

⁴⁸ (Gartland et al., 2022)

should designate WCAG 2.1 Level AA as the minimum auditable standard for large e-marketplace platforms, while allowing proportionate compliance schedules and technical assistance for MSMEs. Komdigi should lead technical supervision in coordination with the Ministry of Trade and BPKN. The enforcement ladder should include mandatory accessibility statements, periodic independent audits, time-bound corrective orders, publication of compliance status, administrative fines proportionate to platform scale and persistence of breach, temporary restriction of non-compliant features where serious harm continues, and civil remedies for consumers who suffer loss. Consumer organizations should retain standing under Article 46 of Law No. 8 of 1999 to seek injunctive relief in the public interest. Platform liability should arise where a platform fails to implement required safeguards, misrepresents compliance, ignores documented barriers, or does not respond to reported abuse. This architecture converts accessibility from voluntary corporate practice into a verifiable legal obligation while preserving proportionality for smaller businesses.

Second, e-marketplaces that are inclusive of people with intellectual and mental disabilities. Inclusive e-marketplaces still pose barriers for consumers with mental and intellectual disabilities. While barriers for people with physical and sensory disabilities can be relatively addressed through a combination of technical standards and WCAG-compliant inclusive design, those with mental and intellectual disabilities still face additional layers of legal and conceptual barriers, specifically regarding legal capacity to engage in legal transactions.

Under Indonesian civil law, legal capacity is one requirement for a valid contract under Article 1320(2) of the Civil Code. Disability alone, however, should not automatically be equated with incapacity. The capacity question must be distinguished from a medical diagnosis and from the need for communication or decision support. Although the Civil Code's guardianship provisions retain status-based language concerning adults who may be placed under *curatele*, a person's contractual capacity should not be denied merely because the person has an intellectual or psychosocial disability; any restriction requires a lawful and individualized basis. Where incapacity is legally established, the resulting contract is generally voidable rather than automatically void. This distinction is essential because blanket presumptions of incapacity conflict with Article 12 of the CRPD and expose consumers to exclusion from ordinary digital commerce.

The CRPD, in fact, takes a very progressive stance regarding the legal capacity of persons with disabilities⁴⁹ e. Article 12(2) of the CRPD affirms that persons with disabilities have legal capacity on an equal basis with others in all aspects of life. This creates a normative gap between the CRPD paradigm, which demands recognition of universal legal capacity, and Indonesian civil law, which still maintains the category of “legally incompetent” for people with intellectual or mental disabilities, requiring them to have a guardian to perform legal acts. The barriers faced by consumers with mental and intellectual disabilities do not stop at issues of interface design accessibility, but also touch on a more fundamental question: whether e-marketplace transactions are considered valid and legally binding. The WCAG accessibility guidelines can indeed help ensure that information is available in a format that is accessible and, as far as possible, easily understood by consumers with disabilities. However, for some individuals with intellectual disabilities or psychosocial disabilities experiencing acute episodes, the primary challenges are not merely access to information, but also the ability to understand the legal consequences of such actions and the free will to make decisions.⁵⁰

Consumers with intellectual disabilities also demonstrate vulnerability to confusion, choice errors, misinterpretation of symbols, and exposure to dark patterns.⁵¹ These barriers cannot be fully addressed simply by applying WCAG accessibility standards designed for people with disabilities in general. This is where a dilemma arises from the perspective of consumer protection for people with disabilities and civil law. Contracts entered into by individuals who lack legal capacity or are in a state of severe mental impairment may be voidable; however, under Article 12(2) of the CRPD, the deprivation of legal capacity solely on the basis of disability is considered discriminatory, and states are encouraged to develop support schemes rather than impose restrictions.

E-marketplace platforms face technical difficulties in identifying whether a user has a mental or intellectual disability that places them in the category of legally incompetent. To what extent are e-marketplace

⁴⁹ Eriksen, Grøndahl, and Sæbønes, “On CRDPs and CRPD: Why the Rights of People with Disabilities Are Crucial for Understanding Climate-Resilient Development Pathways.”

⁵⁰ Slater et al., “Public Attitudes to the Rights and Community Inclusion of People with Intellectual Disabilities: A Transnational Study.”

⁵¹ Gartland et al., “The State of Web Accessibility for People with Cognitive Disabilities: A Rapid Evidence Assessment.”

platforms obligated or entitled to protect merchants from e-marketplace transactions deemed detrimental, without engaging in discriminatory practices, and how should the legal consequences be addressed for contracts entered into when it is later discovered that one of the parties is legally incompetent? A contract entered into by a party deemed legally incompetent carries the consequence that the contract may be rescinded; and if such an e-marketplace transaction is later rescinded, the mechanism for restitution could also be detrimental to the merchant. These questions cannot be addressed solely through the establishment of accessibility standards but require a legal framework regarding legal capacity and special protective mechanisms for consumers with disabilities.

The concept of an e-marketplace inclusive of individuals with intellectual and mental disabilities stems from a paradigm shift from substituted decision-making to supported decision-making. Consumers with intellectual and mental disabilities are still recognized as full legal subjects, but in exercising their legal capacity, they are assisted by a support person. The guardianship paradigm limits or revokes a person's legal capacity, implying that the legal subject's will is replaced and decisions are made by the guardian. This contradicts the principle of equality before the law and is prone to abuse of authority. The new paradigm proposed is the support paradigm, which serves as a mechanism to assist individuals with intellectual or mental disabilities in understanding information, weighing options, expressing their will and preferences, and making decisions on their own behalf. In this support paradigm, the decision-making authority remains with the individual with a disability, not with the support person. This concept of support aligns with Article 12 of the CRPD, which continues to recognize the legal capacity of persons with disabilities. The concept of support as a mechanism for fulfilling the right to legal capacity ensures that every person with a disability is recognized as an equal legal subject by providing the necessary support so that they can exercise their will and preferences freely and responsibly, without the revocation or replacement of their legal capacity.

The solution proposed to create an inclusive e-marketplace, in light of Indonesia's civil law framework, involves restructuring regulations regarding legal capacity and the concept of guardianship to align with Article 12(2) of the CRPD. Legal capacity is a universal attribute inherent to all human beings, and a guardianship system that overrides an individual's will must be replaced with a support model (a decision-

making support system) that respects the will and preferences of the person concerned. A viable solution involves a supported decision-making framework where individuals with mental or intellectual disabilities are still considered legally competent, yet are entitled to and supported in appointing a trusted person to assist them in understanding and consenting to such transactions. This paradigm shift will shift the focus from voiding contracts due to lack of capacity toward ensuring contracts are entered into with adequate support and safeguards.

For consumers who choose support, e-marketplace platforms should provide a companion-account mechanism as an optional supported decision-making tool, not as a condition of access or proof of incapacity. Activation must follow accessible, informed, and recorded consent. The consumer selects the support person, defines permitted functions and transaction thresholds, and may suspend, replace, or revoke access at any time through an equally accessible process. Default settings must preserve the consumer's control. The support person may receive alerts, explain terms in plain language, and confirm that support was provided, but may not complete, redirect, cancel, or appropriate a transaction unless separately authorized under valid law. Platforms must implement role-based access, data minimization, immutable logs, conflict-of-interest declarations, anomaly alerts, periodic re-consent, and an emergency channel for suspected abuse. High-risk transactions should trigger a plain-language summary, a decision pause, and a proportionate cooling-off right. Platform liability arises from failure to implement promised safeguards or respond to documented abuse; support-person liability arises from fraud, coercion, misuse of data, or action beyond the authorized role.

The reality is that the barriers faced by consumers with mental and intellectual disabilities are not solely a matter of technology. The use of digital technology by people with mental and intellectual disabilities demonstrates that while technology can enhance participation and independence, it still requires ongoing human support to help them understand information, weigh options, comprehend risks, and make decisions on their own behalf. A more realistic solution is not to force technology to overcome all limitations, but to design a legal and institutional framework that allows for a combination of inclusive design, human support, flexibility in contract cancellation, and supported decision-making models.

This allocation of control and responsibility is consistent with Islamic legal principles. The consumer's retained authority reflects

ahliyyah and ‘adl; voluntary and revocable assistance prevents wilāyah from becoming unjustified domination; transaction pauses, audit trails, and conflict controls serve ḥifẓ al-māl and the prevention of harm; and accessible explanations and adaptable support give practical effect to raf‘ al-ḥaraj. Maṣlaḥah is therefore pursued through a safeguard that expands participation while controlling abuse, rather than through exclusion from contracting.

The specific barriers faced by people with mental and intellectual disabilities on e-marketplace platforms are a combination of accessibility barriers, comprehension barriers, and legal capacity issues, indicating that a one-size-fits-all approach is inadequate. WCAG and accessibility regulations may be able to address many barriers for consumers with disabilities in general, but for consumers with mental and intellectual disabilities, an additional layer of protection is required in the form of legal capacity reconstruction in accordance with Article 12 of the CRPD and supported decision-making mechanisms in transactions on e-marketplace platforms. Without these measures, the enforceability of contracts in e-marketplace transactions will remain in a gray area: technically, they may be enforceable, but socially and legally, they remain at risk of being deemed unfair, and legally, they are always open to being voided due to issues of capacity, thereby undermining legal certainty for both consumers and businesses.

CONCLUSION

Accessibility for consumers with disabilities on e-marketplace platforms in Indonesia is already supported by a legal framework in various laws and regulations, although these do not specifically address the accessibility rights of consumers with disabilities on e-marketplace platforms. Protecting consumers with disabilities therefore requires e-marketplace platforms to comply with WCAG 2.1 Level AA as a binding minimum accessibility standard. Compliance with WCAG standards does not automatically protect consumers with disabilities; however, the requirement for a minimum standard of WCAG 2.1 Level AA can foster inclusive e-marketplaces in achieving consumer protection for those with disabilities. For consumers with intellectual or psychosocial disabilities, WCAG alone is insufficient because legal capacity must be assessed individually and supported in accordance with Article 12 of the CRPD, rather than presumed absent solely on the basis of disability. An inclusive e-marketplace for consumers with intellectual and mental disabilities can be realized through the concept of an inclusive e-marketplace with a companion account feature. Furthermore, to support

an inclusive e-marketplace for consumers with intellectual and mental disabilities, a substantive legal reconstruction of Indonesia's civil legal capacity is required to align with Article 12 of the CRPD. The regulatory framework should impose statutory accessibility duties, authorize Komdigi to issue and supervise technical standards in coordination with the Ministry of Trade, and assign BPKN an advisory and consumer-protection role. To ensure compliance with the fulfillment of accessibility rights for consumers with disabilities, in addition to oversight and enforcement mechanisms by Komdigi, this can also be implemented through mechanisms for filing lawsuits by consumers or consumer protection organizations. BPKN should advise on consumer protection, while the competent regulator issues technical rules.

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