



INCOME TAX FROM EXCESS OF VAT ON THE SALE OF USED MOTOR VEHICLES

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ABSTRACT

Sales of used motor vehicles in Indonesia are subject to Value Added Tax (VAT) of 10% of the selling price and are charged to consumers. Value-Added Taxes collected when delivering to consumers are called output taxes. According to PMK Number 79 of 2010, Taxable Entrepreneurs (PKP) who sell retail used motor vehicles credit and input tax of 90% of the output tax. Therefore, PKP remits the payable VAT to the state treasury at 1% of the selling price. As a result, there is a more difference of 9% of the selling price paid by consumers and not deposited in the national treasury. According to research, this 9% excess is income for entrepreneurs and may be subject to income tax. However, no regulations are governing further regarding the taxation of this excess. The purpose of this study is to determine the potential income tax on the excess of VAT on the sale of motorcycles and used car retail. The research method used is descriptive qualitative using primary data and secondary data. Primary data is obtained directly from data sources, namely in-depth interviews with practitioners and academics in taxation at the Fiscal Policy Agency and the Directorate General of Taxation. The results of this study are that there is considerable potential regarding aspects of income tax on the excess of VAT on retail sales of used motorcycles and cars.

1. INTRODUCTION

1.1. Background

Motorized vehicles are a means of fulfilling people's transportation needs. Meanwhile, community needs are not only for transportation, but also basic needs, namely clothing, food, and shelter which must be met first. Of course, people as humans who think rationally will try to meet basic needs. However, some Indonesian people have not been able to meet basic needs. *Ekonomi.kompas.com* (2018) states that in 2018 there were still 19.4 million Indonesians unable to meet their daily food needs. From this, it can be concluded that the Indonesian people tend to put aside other needs before basic needs are met and will look for alternative options to meet other needs besides basic needs, one of which is transportation needs. In this regard, buying used motorized vehicles is one of the choices for Indonesians to meet their transportation needs. Used motorized vehicles can be obtained at a much cheaper price than motorized vehicles that are new and still fit for use.

The retail sale of used motor vehicles in Indonesia is subject to Value Added Tax (VAT). The applicable VAT rate is 10% of the selling price. The tax is paid by consumers and collected by entrepreneurs who have been confirmed as Taxable Entrepreneurs (PKP). Then, PKP deposits the outstanding VAT to the state treasury. The mechanism for the imposition of VAT on the sale of retail used motor vehicles is regulated in the Minister of Finance Regulation Number 79 / PMK.03 / 2010 (PMK 79) concerning Guidelines for the Calculation of Input Tax Credit for Taxable Entrepreneurs Conducting Certain Business Activities.

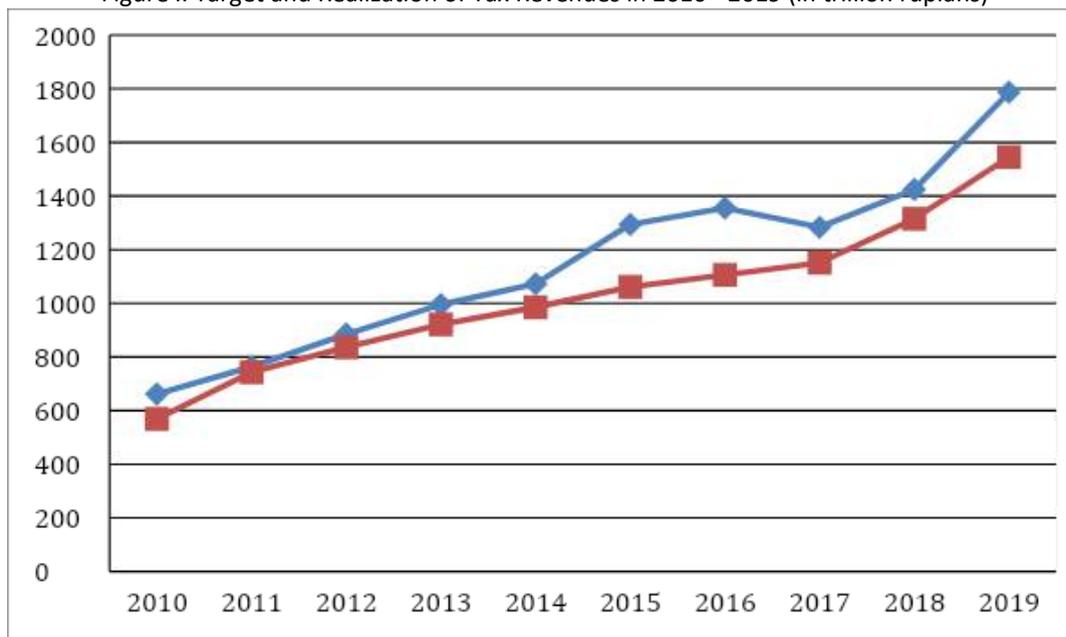
Based on PMK 79, the retail sale of used motor vehicles is a certain business activity. In this regard, PKP selling used motorized vehicles at retail can take advantage of the facility in the form of crediting the input tax by the calculation guidelines. The input tax that can be credited by PKP is 90% of the output tax. Thus, the VAT payable deposited into the state treasury is only 1% of the selling price.¹ As a result, there is an excess of VAT collection of 9% of the selling price from the 10% paid by consumers and not deposited in the state treasury.

Azizah and Wijaya (2020) state that the excess of VAT collection of 9% on retail sales of used motor vehicles is income for PKP and may be subject to income tax. This is potential because the observations and answers of several DGT sources said that this difference of more than 9% is not an object of income tax. Thus, it is assumed that the DGT does not monitor this excess.

Concerning tax revenue, extracting the potential income tax on this excess is considered to increase tax revenue. The realization of tax revenue from 2010 to 2019 has increased every year, although there is still a *gap* between the target and revenue realization. Overall, tax revenues account for more than 80%. The following is a graph of tax revenue.

¹ VAT = VAT out – VAT in
= VAT out – 90%(VAT out)
= (10% x selling price) – (90% x (10% x selling price))
= 1% selling price

Figure I. Target and Realization of Tax Revenues in 2010 - 2019 (in trillion rupiahs)



Source: <https://lokadata.id/data/target-dan-realisisi-pajak-2007-2019-1569470271>, accessed on 15/5/2020

One aspect of tax revenue is VAT on the delivery of used motor vehicles with KLU 45404 (used motorbike retail trade) and KLU 45104 (used car retail trade). In 2019, VAT revenue from KLU 45404 was 0.002% of total tax revenue (Rp32,815,307,266 from Rp1,545,000,000,000,000) and KLU 45104 was 0.004% of total state revenue (Rp61,265,227,274 from Rp1,545,000.000,000,000). On the delivery of used motorized vehicles at retail, there is a potential for income tax in the form of a difference of more than 9%. The excess came from the implementation of VAT in crediting guidelines (*deemed tax*) by PKP for the sale of used motor vehicles. Related to this, the authors are interested in knowing the potential income tax on the excess of VAT on the retail sale of used motor vehicles which can play a role in increasing state revenues.

This study is different from the research of Ramadhan (2011) which analyzes changes in VAT policy on the delivery of used cars and the implications of the changes. Ramadhan (2011) states that the background of the change in VAT policy from another value DPP mechanism (KMK 251/2002) to a guideline mechanism (PMK 79/2010) is the system of *presumptive taxation*² which provides room for

taxpayers to be able to switch to general mechanisms. One of the implications of the change in the VAT policy is that the remaining account is VAT payable in the entrepreneur's books even though the taxpayer (entrepreneur) has carried out the obligation to deposit VAT.

Another study is Ginting and Wijaya (2018) which explain that PKP of used motor vehicle sales is more profitable because of the PM credit guideline scheme based on PMK Number 79/PMK.03/2010. Entrepreneurs receive a difference of 9% on VAT from consumers who are not deposited in the state treasury. This study is also different from Azizah and Wijaya (2020) who analyze the income tax aspects of profits obtained by PKP from retail sales of used motor vehicles. This advantage is in the form of excess VAT on the retail sale of used motor vehicles.

The problem discussed in this study is the potential for income tax on the excess of VAT on retail sales of motorbikes and used cars. The scope of this research is the calculation of the potential income tax on the excess of VAT collection on the retail sale of motorbikes and used cars by PKP with the 45404 and 45104 Business Field Classifications (KLU).

2. THEORETICAL FRAMEWORK

2.1. Definition of Tax

Thuronyi (2003) states that Taxes can be defined as mandatory payments to the government or the state with no direct reciprocity and are used to finance state expenditures intended to serve the public. The general definition of tax is also presented by Ferdinand Kirchhof (1991) in Thuronyi

² *Presumptive taxation* is used in taxing of hard to tax objects (Ramadhan, 2011). J.Alm, *et all* (2004) in Ramadhan (2011) explained that there are some causes of hard tax on taxpayers, namely:

- a. the difficulty of supervision carried out by the tax authorities because of its sizeable population;
- b. low income earned;
- c. no bookkeeping;
- d. economic transactions in the form of cash; and

- e. there is a high probability that the taxpayers will hide the actual amount of income.

(2003), "Monetary contributions imposed unilaterally based on public law which function to increase revenue and be paid to public authorities". Based on the explanation above, there are characteristics inherent in the definition of a tax, as follows.

- a. Tax is one of the obligations that must be fulfilled by the community;
- b. Tax collection is based on the provisions of the applicable laws and regulations;
- c. Taxpayers do not receive direct feedback or contra performance; and
- d. Taxes are used to finance state expenditures aimed at serving the public.

Several tax divisions in tax law are based on the characteristics of each type of tax (Brotodihardjo & Santoso, 1995). One of the tax division is a direct tax and indirect tax. Beltrame & Mehl (1997) in Thuronyi (2003) states that direct taxes are imposed on individuals or property, while indirect taxes are imposed on manufacturing, sales, consumption, and the like, and payments are made indirectly by consumers. The *World Trade Organization Agreement* explains that direct taxes are taxation of salaries, profits, interest, rent, royalties, and other income in any form, as well as taxation of property ownership. Meanwhile, indirect taxes are imposed on sales, excise, transfer, value-added, franchising, stamps, transfers, inventory and equipment taxes, border taxes, and other taxes other than direct taxes and import costs (Thuronyi, 2003).

2.2. Definition of Income

Economically, what is meant by income is the net cash flow and the present value of the net cash flow in the future (Budiartha, 2008). According to Budiartha (2008), it is difficult to determine future cash flows to determine economic income. Therefore, economic income can be determined from the recognition of income that has already been realized and what has not been realized.

On the other hand, Statement of Financial Accounting Standards (PSAK) Number 23 concerning Income also explains the definition of income. The Basic Framework for the Preparation and Presentation of Financial Statements explains that income is the addition of economic benefits in the accounting period in the form of an income or increase in assets or a decrease in liabilities which results in an increase in equity that is not from investors. Economic transactions that generate income,

including sales, income from services, interest, dividends, royalties, and rent. This income will be recognized and reported in the profit or loss. Income recognition is characterized by increasing assets or decreasing liabilities.

Meanwhile, the definition of income according to tax is explained in article 4 paragraph 1 of Law Number 36 the Year 2008 concerning Income Tax (Income Tax Law). Income is any additional economic capability received or obtained by a taxpayer, originating from Indonesia or outside Indonesia which can be used for consumption or to increase the wealth of the taxpayer concerned, under whatever name and form. For tax purposes, income is calculated on an annual basis or in a definite period (Seligman, 1914).

Three general concepts explain the definition of income, namely the *accretion concept*, the *source concept*, and the *trust concept*. The *Accretion concept* is applied in the United States.³ This concept explains that any increase in wealth is called income. Meanwhile, according to the *income source concept* is something that comes from a source of income. On the other hand, the *trust concept* is a concept of income that is commonly found in *commonwealth countries*. Whatever the concept of income is applied, income must be realized to be taxed (Thuronyi, 2003).

2.3. Income Taxes

According to Whittenburg and Altus-Buller (2011), five entities can be taxed, namely individuals, corporate bodies, partnerships, *estates*, and *trusts*. Individual income that is subject to tax is generally in the form of salaries, wages, rent, interest, and dividends. Meanwhile, corporate income that may be subject to tax is in the form of income from trade in goods and services (health, law, engineering, architecture, accounting, actuarial, performing arts, and consulting). Whittenburg and Altus-Buller (2011) explain that in tax law, gross income or income is all income obtained from various sources.

The calculation of income tax payable begins with the determination of the taxable income, then multiplied by the income tax rate. Taxable income is determined from gross income or income less cost of goods

³ Victor Thuronyi, *Comparative Tax Law* (2003) page 235

sold and expenses related to business activities. According to Thuronyi (2003), all expenses or expenses related to business activities can be deducted, except for:

1. enjoyment or in-kind used for personal, or
2. gain capital acquisition (must be capitalized in the form of depreciation every year), or
3. other expenses that cannot be deducted. that has been regulated (for example, taxes, fines, bribes, and political contributions).

Regarding income tax rates, tax rates vary by country. Usually, for individual taxpayers, the applicable tax rate is progressive. Meanwhile, for corporate taxpayers, a tax applies a flat rate (Thuronyi, 2003).

2.4. Value Added Tax

Value-added Tax (VAT) is a transaction tax that is collected at all stages of production and distribution. This tax is imposed on transactions of goods and services. Transactions subject to tax are the supply of goods and services specified in the regulation (negative list). The goods in question are tangible goods, except land and money. Meanwhile, services that are subject to VAT cannot be determined with certainty and comprehensively (Thuronyi, 2003).

The mechanism used to determine domestic consumption VAT is the invoice-credit mechanism. Taxpayers who have a tax invoice on the transaction for the acquisition of goods or services can credit the tax paid to entrepreneurs who provide goods or services. This crediting only applies to goods or services that are directly related to the business which is subject to tax (Thuronyi, 2003).

2.5. Business Process of Selling Used Motor Vehicles in Retail

The business of selling used vehicles at retail is a business that is owned by an individual or in the form of a body. The majority of retail used motor vehicle business owners who have been confirmed as Taxable Entrepreneurs (PKP) are corporate taxpayers. In this regard, several types of dealers sell used cars in Indonesia. IPSOS (2016) mentions the types of the dealer is *independent seller*, *auction house*, *independent dealers*, dealers who are part of the automotive companies (*branded/chained dealers*), a used car dealer

certified OEM (*OEM certified used car dealers*).

To carry out business activities, dealer entrepreneurs must know and understand the business processes of the business. Related to this, the business process of selling used retail motor vehicles is divided into four major groups, namely purchasing, maintenance and maintenance, marketing, and sales.

Acquisition or purchase of used motor vehicles usually comes from private individuals, but some also come from business entities. Things that must be considered by entrepreneurs when buying a used motor vehicle are the completeness of the documents and the condition of the vehicle. To maintain the quality of used motorized vehicles being sold, entrepreneurs carry out maintenance and maintenance. Also, entrepreneurs often make repairs to used motor vehicles that are being sold to keep them functioning properly.

About marketing, used motor vehicle sales entrepreneurs use social media to promote goods, such as Instagram and Facebook. Entrepreneurs selling used and retail motor vehicles also place advertisements on platforms of online buying and selling, such as OLX. This is considered to affect the level of sales because almost everyone wants an easy and cheap transaction. By accessing applications that are already on their cell phones, prospective buyers can find out what used goods or motorized vehicles to buy.

Furthermore, the sale of used motor vehicles is carried out at retail. Concerning selling prices, retail used motor vehicle sales entrepreneurs determine the selling price according to market prices. Based on the results of an interview with a used car buying and selling businessman in Surakarta, the businessman made a profit from selling approximately 10 percent.⁴

Concerning sales, buyers of used motor vehicles can choose the payment system that applies to the dealer. Payment systems that are commonly implemented are cash and credit. The credit payment system can be through leasing services or leasing companies that have worked with dealers. Several finance companies in connection with the purchase of used cars, including Andalan

⁴ The interview was done by the author on March 14, 2020, in Surakarta.

Finance, Astra Credit Companies, Bima Finance, IAF Multifinance, BCA Finance, Indomobil Finance, and Adira Finance (cermati.com, 2020).

By the PPN provisions, the buyer or consumer is charged VAT at the time of delivery of the used motor vehicle from the seller or entrepreneur. Value Added Tax (VAT) that is collected upon delivery of the goods is 10% of the selling price. This tax is collected by entrepreneurs who have been confirmed as PKP and deposited in the state treasury.

2.6. Previous Research

Ramadhan (2011) explains that the background of changing the VAT policy from another value DPP mechanism to a guidance mechanism for crediting input taxes on the delivery of used cars is the government's effort to include used car entrepreneurs into the system presumptive taxation which provides space for taxpayers to switch to the general mechanism. The implication of changing the VAT policy on the delivery of used cars is that there is a remaining account *payable VAT* in the entrepreneur's books even though they have carried out the VAT deposit obligation, the possibility of an increase in car prices due to the effective VAT rate, and the possibility of employers using the general mechanism of the change in the definition of the *taxable person*.

Ginting and Wijaya (2018) explain that there are differences in VAT collection on used motorized vehicle sales at retail based on KMK Number 251/KMK.03/2002 and PMK Number 79/PMK.03/2010. According to KMK No.251/KMK.03/2002, the purchase price borne by consumers of used motor vehicles is smaller than when PMK No.79/PMK.03/2010 was implemented. Furthermore, PKP sales of used motor vehicles also benefit more from the latest scheme because they get a difference of more than 9% of the total VAT collected from consumers by 10%.

Azizah and Wijaya (2020) explain that the difference over 9% VAT collection on used motorized vehicle sales at retail comes from the input tax crediting policy using the calculation guidelines according to PMK Number 79 of 2010. At the time of delivery of used retail motor vehicles, consumers are charged VAT of 10% of the selling price and is collected by the PKP. For PKP, the VAT collection is called the output tax. Taxable entrepreneurs selling used retail motor vehicles are entitled to use facilities in the

form of input tax crediting guidelines of 90% of the output tax. Therefore, the VAT payable must be paid to the state treasury by PKP is 1% of business turnover. As a result, there is an excess VAT difference of 9% which comes from VAT payments by consumers and is not deposited into the state treasury. This excess is defined as the income earned by entrepreneurs so that it can be subject to income tax.

3. RESEARCH METHODS

The research method that we used in this research is qualitative. According to Basrowi and Suwandi (2008), qualitative research is useful for knowing the relationship of the parts being studied clearly and thoroughly. Also, the studies conducted qualitatively are carried out in a deep, historical manner related to socio-economic changes, and are complex.

The types of data used in this study are primary data and secondary data. Primary data is data obtained directly from the source by conducting *in-depth interviews*. In-depth interviews were conducted with sources or informants who had extensive knowledge in their fields (key informants) so that accurate data could be obtained (Musianto, 2002). Resource persons in this study were practitioners and academics in the field of taxation at the Fiscal Policy Agency and the Directorate General of Taxes. Meanwhile, secondary data is data obtained from scientific journals related to research, tax regulations (Value Added Tax and Income Tax), books, news, and reports related to analysis materials.

The analysis method used is literature study and tax potential calculation method. Zed (2008) in Kartiningrum (2015) explains that literature studies are carried out by collecting library data to build a theoretical framework, taking notes and reading, and processing research data for analysis. Meanwhile, the potential income tax on this excess is calculated by multiplying the tax rate (%) by the excess. The excess is obtained from the reduction of output tax (output VAT) with the VAT payable to the state treasury. The following is an illustration of calculating the potential tax on excess differences.

Tax potential =% x (Output VAT - VAT payable) to the state treasury.

4. RESEARCH RESULTS

4.1. Value Added Tax Aspects of Delivery of Used Motor Vehicles in Retail

Motor vehicles are taxable goods. In-Law Number 42 of 2009 concerning Value Added Tax on Goods and Services and Sales Tax on

Luxury Goods (PPN Law) article 4A paragraph 2, it is stated that four types of goods are not subject to VAT, which are as follows:

- a. mining or drilling products are taken directly from the source;
- b. staple goods which are needed by the people at large;
- c. food and beverages served in hotels, restaurants, stalls, and the like, including food and beverages, whether consumed on the spot or not, including food and beverages delivered by a catering or catering business; and
- d. money, bullion, and securities.

The substance of Article 4A paragraph 2 of the VAT Law is a negative list, meaning that the types of goods not mentioned in the article are taxable goods. Therefore, motorized vehicles are a type of goods subject to VAT.

In connection with the business of buying and selling used motorized vehicles at retail, the delivery of motorized vehicles is subject to VAT. This is regulated in Article 4 of the VAT Law, the namely value-added tax is imposed on the delivery of taxable goods (BKP) within the customs area by entrepreneurs. Also, the business of buying and selling used motorized vehicles is a certain business activity. This is regulated in the Regulation of the Minister of Finance Number 79/PMK.03/2010 Article 2.

The business of selling used motorized vehicles at retail is referred to as a certain business activity because, in the business process, entrepreneurs buying and selling used motorized vehicles acquire goods (used motor vehicles) from consumers who are mostly private people and not PKP. Such an individual cannot issue a tax invoice on the delivery of a motorized vehicle so that the businessman (PKP) of buying and selling used motorized vehicles cannot credit the input tax on the acquisition of the merchandise. Also, entrepreneurs do not buy other capital goods in running this business so no input tax can be credited. If using a general mechanism, entrepreneurs buying and selling used motorized vehicles will object because they are obliged to pay an output tax equal to the delivery made without crediting the input tax (Setiawan HB, 2020).

Also, four risk components PKP faces and become the state's consideration in determining the policy for crediting input tax of 90% of the output tax. **First**, related to the cost. Often PKP finds shortcomings when

obtaining used motorized vehicles. Due to these shortcomings, PKP has to pay to repair the damage by replacing several spare parts and regularly cleaning the used motor vehicle inventory to make it look attractive. **Second**, related to maintenance until it is sold, namely PKP must clean the vehicle, change the oil, buy fuel to heat the vehicle, and replace *spare parts* that are no longer suitable for use. **Third**, motor vehicle tax. The longer the used motor vehicle has not been sold, the motor vehicle tax will be borne by the seller, both the tax base and administrative sanctions, as well as the risk of revoking the file if the buyer comes from outside the city. **Fourth**, the risk of falling market prices. The market price of used motorized vehicles has decreased every year even though the vehicle is not used and is always maintained before selling (ABC, 2020).

Therefore, the government through the Ministry of Finance regulates input taxes that can be credited by entrepreneurs engaged in the sale and purchase or delivery of used motor vehicles to maintain business continuity (Setiawan HB, 2020). The entrepreneur in question is taxable. In the Regulation of the Minister of Finance Number 79/PMK.03/2010, it has been stipulated that PKPs who deliver used motorized vehicles at retail can credit input tax (input VAT) of 90% of the output tax.

Output tax (output VAT) is a value-added tax collected on the delivery of motorized vehicles from PKP to the final consumer at 10% of the selling price. With a mechanism based on PMK Number 79, PKP only remits VAT on the delivery of used motor vehicles to the state treasury at 1% of the business circulation. The mathematical calculation is $1\% = (10\% \times \text{business turnover}) - (90\% \times 10\% \times \text{business turnover})$.

4.2. Income Tax Aspects of the Over VAT Difference on the Delivery of Used Motor Vehicles in Retail

Delivery of used motorized vehicles by taxable entrepreneurs to consumers is subject to VAT at 10% of gross circulation. The imposition of this tax is called an output tax (output VAT) because of the delivery. Based on PMK Number 79/PMK.03/2010, the input tax that can be credited for the delivery of used motorized vehicles is calculated using the input tax crediting calculation guideline of 90% of the output tax. Thus, the VAT that must be deposited into the state treasury is

1% of business turnover. As a result, there is an excess of VAT on the delivery of used motorized vehicles at retail by 9% of the business circulation (ABC, 2020).

According to Hadi Setiawan (2020), the excess of VAT collection on the delivery of used motorized vehicles that are not deposited into the state treasury will become income for PKP. Haris Budi Setiawan (2020) also said the same thing that the difference of more than 9% VAT from business circulation in the delivery of used motorized vehicles can be income for PKP. This excess of 9% is in the form of cash that has been collected from consumers for the delivery of BKP (used motorized vehicles) and the state only gives instructions to deposit into the

state treasury only 1% of the business turnover and does not further regulate the taxation of this excess difference. Therefore, this excess is subject to income tax. Also, several informants agreed that the excess of VAT collection of 9% was income.

Table 1. Excess VAT Difference in Submission of Used Motor Vehicles is Income

Informant's	Information	Interview Results
ABC	Tax officer, academics, and practitioners in the field of taxation	Become income and can be subject to income tax (PPh) because the VAT that has been collected from consumers is not entirely deposited into the state treasury so that there are leftovers that are still carried PKP. This refers to article 4 of the Income Tax Law, any additional economic capacity obtained by taxpayers from Indonesia in any form.
Haris Budi Setiawan	Tax officer, academics, and practitioners in the field of taxation.	Perhaps the basis for income is article 4 paragraph 1 letter p of the Income Tax Law, namely additional net assets from income that has not been taxed.
Hadi Setiawan	Researcher at the Fiscal Policy Agency	Can become income based on article 4 of the Income Tax Law, which is an additional economic capacity in any form that taxpayers receive from Indonesia.
Nofizal Kurniawan	Officer Sub directorate of Industrial VAT, Directorate of Taxation Regulations 1, Directorate General of Taxes	Profits or other profits for PKP based on article 4 paragraph 1 of the Income Tax Law.

Source: interview result

Furthermore, this excess of 9% can be proven as income using the debt relief approach. Debt relief is a decision to free debt or not to collect debtor debt by creditors, while the process for debt relief is called debt relief (Ardiansyah, 2020). Debt write-off is the process of writing off a debtor's debt record so that it is no longer recognized in the financial statements.

In accounting, there is no explicit explanation regarding debt write-off. On the other hand, receivables write-off is described in PSAK 55 which is updated with PSAK 71 concerning financial instruments. Debt and receivables are financial instruments and occur in two parties, namely debtors and creditors. Both have a reciprocal relationship.

The existence of debt write-offs, of course, begins with the creditors' accounts receivable write-off. However, in certain cases, debt write-offs can occur without the creditors having written off their accounts. This happens because creditors do not record the right to collect receivables from debtors (Ardiansyah, 2020).

Table 2. The Relationship of Debt Relief and Debt Write-Off

Informant's	Information	on Interview Results
Agung Dinarjito	Academician in accounting	In accounting, there is no term debt relief, but debt relief. The debt write-off is regulated in PSAK 55 (currently PSAK 71).
Zef Ardiansyah	Academician in accounting	Debt relief is not well known in accounting. However, there is a relationship between debt relief and debt relief. Debt relief is a decision to free debt or not to collect debtors' debt. Meanwhile, debt write-off is the process of writing off debtors' debt balances in the financial statements so that they are no longer recognized.

Source: interview results

In this case, the debtor is the taxpayer (PKP) and the government is the creditor. Meanwhile, the debt in question is tax debt, namely the output VAT debt. Every time a delivery is made, PKP should collect output VAT and record it in the books as output VAT debt. After that, PKP is obliged to deposit the debt into the state treasury. The following is the recording scheme.

Records of selling

Cash	XXX	
Sales		XXX
VAT debt output		XXX

Record of depositing output VAT debt to the state treasury

VAT debt output	XXX	
Cash		XXX

In accounting, all debt must be deposited because it is a third-party debt from economic transactions (Dinarjito, 2020). On the other hand, the state (government) regulates that the output VAT debt paid by PKP to the state treasury is not as large as that collected from third parties for the delivery of goods, but only a percentage of the gross economic transaction turnover. This results in an excess of VAT collection on the delivery of goods in economic transactions. As a result, there is a balance of the output VAT debt in the PKP books. In this case, the state as the creditor does not account for the receivables that can be collected from the debtor for the difference between the collection of output VAT and deposits to the state treasury.

In this connection, the excess of VAT collection or output VAT debt balance in the debtor's books (PKP) can be written off. The

conceptual framework of the financial statements states that revenue is an increase in equity which is characterized by an increase in assets or a decrease in debt that does not come from direct transactions with the owner (Dinarjito, 2020). In line with this, debt write-off will become income for the debtor. In terms of taxation, opinion is also defined as income. Therefore, PKP records the benefits of the output VAT debt write-off in the credit section to write off the output VAT debt balance on the delivery of used motor vehicles. This recording is carried out in conjunction with the recording of the time for depositing the output VAT debt to the state treasury. The following is the recording scheme.

VAT payable output	XXX	
Cash		XXX
Advantages of debt write-off		XXX

or

VAT debt output	XXX	
Other income		XXX

For the gain on output VAT debt relief or other income accounts, it will be reported in the profit and loss financial statement, to be precise in the other income section. Referring to the concept of income article 4 of the Income Tax Law, the object of the tax is income, namely any additional economic capacity obtained by taxpayers from Indonesia or outside Indonesia, which can be used for consumption or to increase the wealth of the taxpayer concerned, with name and form. anything. Therefore, the write-off of the output VAT debt balance may be subject to income tax.

Table 3. Accounting Treatment for the Over Difference of VAT Collections on Delivery of Used Motor Vehicles

Informants	Information	on Interview Results
Agung Dinarjito	Academician in accounting	For the excess difference in VAT collection (account: VAT debt), VAT debt accounts (D) are recorded against other income accounts (K). This other income will be included in

		the other income accounts of the financial statements.
Zef A	Academician in accounting	The excess difference in VAT collection can be recorded when the payment or depositing of VAT to the country by recognizing the advantage of VAT debt relief. The recording is the PPN debt account for the collected VAT (D) on the cash account for depositing the VAT debt to the state treasury (K) and the VAT debt write-off profit on the excess of the collection (K). The profit from this VAT debt write-off will be included in other income items in the financial statements.

Source: interview results

This is by the theory presented by Thuronyi (2003) that the benefits of debt relief can be taxed like other types of income. This is applied in countries that adhere to the concept of *global accretion income*, such as the *United States*. Judging from the definition of income in the Income Tax Law, Indonesia also adheres to the concept of *global accretion income*.

"... income, that every increase in economic capability received or accrued by a Taxpayer, both from Indonesia and outside Indonesia, which can be used for consumption or to increase the wealth of the Taxpayer is concerned, the name and in any form ..."

Also, Detweiler (2009) in Darussalam (2020) states that one of the income included in other income groups is debt relief. The same thing was also written by Whittenburg and Altus-Buller (2011) that income from debt write-offs as part of *gross income*. Although in theory the excess of VAT collection on used motorized vehicle retail sales is income and may be taxed, no regulation discusses this matter further. Lack of legal certainty has resulted in the inadequate exploration of potential income tax.

4.1. Tax Potential for the Over Difference of VAT Collection on Retail Sales of Used Motorized Vehicles

Regulation of the Minister of Finance Number 79 of 2010 (PMK 79) which regulates the Guidelines for Calculating Input Tax Credits for Taxable Entrepreneurs Conducting Certain Business Activities came into effect in April 2010. This regulation replaces the

Minister of Finance Regulation Number 251 of 2002 (KMK 251) concerning Other Values as Tax Imposition Basis. Before 2010, the imposition of VAT on the retail sale of used motor vehicles used a DPP of another value, which was 10% of the selling price. Thus, the VAT owed by the consumer at the time of delivery of the used motor vehicle is 1% of the selling price. KMK 251 also explains that entrepreneurs (PKP) cannot credit the input tax because it has been calculated in the DPP other values. As a result, the VAT payable deposited by PKP in the state treasury is the same as VAT paid by consumers, which is 1% of business turnover, so there is no excess VAT difference.

This is different from the mechanism for calculating input tax crediting. The PMK 79 regulation already states that whatever the output tax and input tax for PKP for retail used motor vehicles, the input tax that can be credited by PKP is only 90% of the output tax. As a result, there is always an excess. According to Azizah and Wijaya (2020), the excess of VAT collection on the sale of used retail motor vehicles is income and can be taxed according to the Income Tax Law. However, there are no regulations that regulate this. This causes taxpayers to be ignorant in applying tax regulations and the tax authorities fail to pay attention to the sizeable potential income tax.

The calculation of potential income tax on the excess VAT difference on the retail used motor vehicle sales can be made from the VAT revenue data with KLU 45404 (used motorbike retail trade) and KLU 45104 (used car retail trade).

Table 4. VAT Receipts KLU 45404 and 45104 Years 2009 - 2019

Years	KLU 45404	KLU 45 104
2009	674,850,000	7,488,150,000
2010	Jan - Mar = 226,000,000	Jan - Mar = 6,139,000,000
	Apr - Dec = 678,000,000	Apr - Dec = 1,841,700,000
2011	1,098,450,000	3,984,930,000
2012	1,784,170,000	5,483,380,000
2013	1,549,580,000	11,075,920,000
2014	2,336,191,484	57,396,759,975

2015	5,290,764,900	34,175,011,787
2016	25,158,472,335	27,552,443,911
2017	34,640,204,454	28,505,189,120
2018	38,713,256,573	43,507,141,434
2019	32,815,307,266	61,265,227,274

Source: Final Paper M. Enteguh Syach Ginting and Directorate of Tax Data and Information, Directorate General of Taxes

4.3.1. Potential Income Tax on the Difference Over VAT on Retail Used Motorcycle Sales

The following is the calculation table for PKP KLU 45404 turnover (used motorbike trade) for 2009 to 2019.

Table 5. Calculation of PKP KLU 45404 Turnover for 2009 - 2019

Year	PPN KLU 45404 PPN Receipt	PKP Turnover
2009	Rp674.850.000	67,485,000,000
2010	Jan-Mar = Rp226,000. 000	Jan - Mar = Rp22.600.000.000
	Apr - Des = Rp678.000.000	Apr - Des = Rp67.800.000.000
2011	Rp1.098.450.000	Rp109.845.000.000
2012	Rp1.784.170.000	Rp178.417.000.000
2013	Rp1.549,580,000	Rp154,958,000,000
2014	Rp2,336,191,484	Rp233,619,148,400
2015	Rp5,290,764,900	Rp529,076,490,000
2016	Rp25,158,472,335	Rp2,515,847,233,500
2017	Rp34,640,204,454	Rp3.464,020,445,400
2018	Rp38,713,256,573	3,871,325,657,300
2019	Rp32,815,307,266	3,281,530,726,600

Source: processed by the author

By the table above, in 2010 it was divided into two PPN receipts of KLU 45404. First (month January - March), VAT receipts collected based on another value DPP mechanism regulated in KMK Number 251 of 2002. Value-added tax is collected at 1% of the selling price. Second (April - December), VAT receipts are collected based on the credit guidance mechanism stipulated in PMK Number 79 of 2010. Value-added tax is collected, namely 10% of the selling price, then remitted to the state at 1% of the selling price.

The calculation of the potential tax on the excess of 9% VAT collection on used retail motor vehicle sales begins by calculating the turnover or circulation of the related PKP business. By using the data of PPN KLU 45404 (used motorbike trade) receipts, the turnover or business circulation is obtained as listed in the table above. The turnover or business turnover is the amount of business turnover obtained by PKP for used motorbike trade throughout Indonesia because the data obtained is based on KLU. The following illustrates the calculation of turnover or business turnover in 2010 from April to December.

A 1% rate applies because the used motorbike trade is a certain business activity. Input tax is calculated based on the crediting guidelines, which is 90% of the output tax. The output tax is 10% of the turnover of the business (selling price). Thus, the effective rate that PKP deposits into the state treasury are 1% of business turnover (selling price).

$$\begin{aligned} \text{Turnover in 2010 (Apr-Dec)} \\ &= \text{IDR } 678,000,000 / 1\% \\ &= \text{IDR } 67,800,000,000 \end{aligned}$$

After calculating the circulation of the used motorbike trade PKP business, the next step is to calculate the output tax and input tax. The amount of output tax is 10% of business turnover. Meanwhile, the input tax is calculated using the input tax crediting calculation guidelines that have been regulated in PMK Number 79 of 2010, which is 90% of the input tax. The following is an illustration of the 2010 calculation in April - December and the table of calculation results.

$$\begin{aligned} \text{2010 (Apr-Dec)} \\ &= \text{Rp.}67,800,000,000 \end{aligned}$$

$$\begin{aligned} \text{Output tax} \\ \text{business turnover} &= 10\% \times \text{business turnover} \end{aligned}$$

$$\begin{aligned} \text{2010 VAT revenue (Apr-Dec)} \\ &= \text{IDR } 678,000,000; \\ \text{Applicable VAT rate} &= 1\% \end{aligned}$$

= 10% x Rp.67,800,000,000
 = Rp.6,780,000,000

= IDR 6,102,000,000

Input tax
 = 90% x output tax
 = 90% x IDR 6,780,000,000

VAT underpayment
 = output tax - input tax
 = IDR 6,780,000,000 - IDR 6,102,000,000
 = IDR 678,000,000

Table 6. Calculation of Output VAT and Input VAT of KLU 45404 in 2010 (April - December) until 2019

Year	Output VAT	Input VAT	VAT payable
2010	Rp6.780.000.000	Rp6.102.000.000	Rp678.000.000
2011	Rp10.984.500.000	Rp9.886.050.000	Rp1.098.450.000
2012	Rp17.841.700.000	Rp16.057,530,000	Rp1,784,170,000
2013	Rp15,495,800,000	Rp13,946,220,000	Rp1,549,580,000
2014	Rp23,361,914,840	Rp21,025,723,356	Rp2,336,191,484
2015	Rp52,907,649,000	Rp47,616,884.100	Rp5,290,764,900
2016	Rp251,584,723,350	Rp226,426,251,015	Rp25,158,472,335
2017	Rp346,402,044,540	Rp311,761,840,086	Rp34,640,204,454
2018	Rp387,132,565,730	Rp348,419,309,157	Rp38,713,256,573
2019	Rp328,153,072,660	Rp295,337.7 65,394	Rp32,815,307,266

Source: processed by the author

Based on the table above, there is a difference between the output VAT collected from consumers at the time of delivery of goods and the VAT payable which is deposited in the state treasury. By the explanation in the previous sub-chapter, this difference of more than 9% is income for PKP used motorbike trade. Several informants in the field that the author interviewed said that they did not know and did not realize that this difference of more than 9% was income so that it was not taken into account in calculating their income tax. Therefore, there is a tax potential that has not been explored optimally. To find out how much potential existing taxes are, here is an illustration and the results of calculating the potential tax on this difference of more than 9% in the used motorbike trade (KLU 45404).

= output tax - VAT payable to the state treasury
 = Rp6,780,000,000 - Rp678,000,000
 = Rp6,102,000,000

Potential income tax
 = 25% x Rp6,102,000,000
 = Rp525,500,000

The tax rate used in the calculation of this potential tax is 25%. The assumption is based on the type of taxpayer engaged in the sale of used motor vehicles. Most of the taxpayers who are involved in this business and become PKP are corporate taxpayers. So, the calculation of potential tax uses a corporate income tax rate of 25%. The following table details the potential income tax on the excess VAT on used motorbikes at retail.

Difference in 2010 VAT collection (April - December)

Table 7. Potential Income Tax on the Difference Over VAT Collection on Used Motorcycle Trade (KLU 45404) in 2010 (April - December) to 2019

Year	Over Difference in	Potential Taxes
2010	Rp6,102,000,000	Rp1,525,500,000
2011	Rp9,886,050,000	Rp2,471.512.500
2012	Rp16.057.530.000	Rp4.014.382.500
2013	Rp13.946.220.000	Rp3.486.555.000
2014	Rp21.025.723.356	Rp5.256.430.839
2015	Rp47.616.884.100	Rp11.904.221.025
2016	Rp226,426,251,015	Rp56,606,562,754
2017	Rp311,761,840,086	Rp77,940,460,022
2018	Rp348,419,309,157	Rp87,104,827,289
2019	Rp295,337,765,394	Rp73,834,441,349
	Total	Rp324,144,893,277

Source: processed by the author

Based on the data above, the tax potential on the excess of VAT collection is quite large. With such a large amount, the tax potential is useful for achieving tax targets. Supposedly, the tax potential can be explored optimally. Tax potential can be extracted by issuing provisions regulating the excess VAT collection on the sale of used motor vehicles. Until now, no regulations are governing this matter.

4.3.2. Potential Income Tax on the Difference Over VAT on Retail Used Car Sales

Furthermore, the calculation of the potential tax for KLU 45104 (used car trade) is the same as the potential tax calculation for KLU 45404. The following is the calculation of the potential tax on the excess VAT collection on the used car trade (KLU 45104) which begins with the turnover calculation.

Table 8. Calculation of PKP KLU Turnover 45104 the Year 2009 - 2019

Year	VAT Receipt of KLU 45104	PKP Turnover
2009	Rp7,488,150,000	Rp748,815,000,000
2010	Jan-Mar = Rp6,139,000,000	Jan-Mar = Rp613,900,000,000
	Apr - Dec = Rp1,841,700,000	Apr - Dec = Rp184,170,000,000
2011	Rp3,984,930,000	Rp398,493,000,000
2012	Rp5,483,380,000	Rp548,338,000,000
2013	Rp11,075,920,000	Rp1,107,592,000,000
2014	Rp57,396,759,975	Rp5,739,675,997,500
2015	Rp34,175,011,787	Rp3,417,501,178,700
2016	Rp27,552,443,911	Rp2,755,244,391,100
2017	Rp28,505,189,120	Rp2,850,518,912,000
2018	Rp43,507,141,434	Rp4,350,714,143,400
2019	Rp61,265,227,274	Rp6,126,522,727,400

Source: processed by the author

By the data above, the results of calculating output VAT and input VAT related to used car trade are as follows:

Table 9. Calculation of Output VAT and VAT Input KLU 45104 the Year 2010 (April - December) to 2019

Year	VAT Output	VAT Input	VAT Payable
2010	Rp16.575.300.000	Rp18.417.000.000	Rp1.841.700.000
2011	Rp39.849.300.000	Rp35.864.370.000	Rp3.984.930.000
2012	Rp54.833.800.000	Rp49.350.420.000	Rp5.483.380.000
2013	Rp110.759.200.000	Rp99.683.280.000	Rp11.075.920.000
2014	Rp573.967.699.750	Rp516.570.839.775	Rp57.396.759.975
2015	Rp341.750.117.870	Rp307.575.106.083	Rp34.175.011.787
2016	Rp275.524.439.110	Rp247.971.995.199	Rp27.552.443.911
2017	Rp285.051.891.200	Rp256.546.702.080	Rp28.505.189.120
2018	Rp435.071.414.340	Rp391.564.272.906	Rp43.507.141.434
2019	Rp612.652.272.740	Rp551.387.045.466	Rp61,-265.227.274

Source: processed by the author

Based on the data above, there is a difference between the additional VAT collection when the used car is delivered from PKP to the consumer by depositing the payable VAT to the state treasury. On the

excess, there is a potential tax. The following is a calculation of the potential tax on the excess of VAT collection on the used car trade (KLU 45104).

Table 10. Potential Income Tax Over Difference of VAT Collections on Used Car Trade (KLU 45104) Year 2010 (April - December) to 2019

Year	Over Difference	Potential Tax (difference over x 25%)
2010	Rp16.575.300.000	Rp4.143.825.000
2011	Rp35.864.370.000	Rp8.966.092.500
2012	Rp49.350.420.000	Rp12.337.605.000
2013	Rp99.683.280.000	Rp24.920.820.000
2014	Rp516.570.839.775	Rp129.142.709.944
2015	Rp307.575.106.083	Rp76.893.776.521
2016	Rp247.971.995.199	Rp61.992.998.800
2017	Rp256.546.702.080	Rp64.136.675.520
2018	Rp391.564.272.906	Rp97.891.068.227
2019	Rp551.387.045.466	Rp137.846.761.367
	Total	Rp618.272.332.877

Source: processed by the author

Calculation of potential tax on the excess of VAT collection on used car trade uses a rate of 25%. The use of this rate is because most of the used car trade taxpayers and becoming PKP are corporate taxpayers. Therefore, the calculation of this potential tax uses an assumption of a 25% corporate tax rate. From the above calculations, the potential tax on the excess of VAT collection on used motorbikes from 2010 (April - December) to 2019 is Rp324.144.893.277. Meanwhile, the potential for the excess tax on VAT collection on used car trade from 2010 (April - December) to 2019 is Rp618.272.332.877.

The potential for income tax on a difference of more than 9% from the collection of VAT on used retail motor vehicle sales is substantial. Therefore, proper steps are needed to extract tax potential optimally. That way, tax revenue will be maintained and reach the target. However, no regulation regulates the excess of VAT collection on used retail motor vehicle sales. This becomes an obstacle for tax officials to explore the potential. Also, the absence of legal certainty makes taxpayers confused and do not know how to properly treat this excess collection difference. Therefore, the government through the Directorate General of Taxes is expected to make regulations regarding the tax treatment of the excess VAT collection on the sale of this used retail motor vehicle. That way, the optimization of potential exploration has a strong basis.

5. CONCLUSIONS AND RECOMMENDATIONS

The potential income tax on a difference of more than 9% on the collection of VAT on used motorbikes (KLU 45404) from 2010 (April to December) to 2019 is Rp324.144.893.277. Meanwhile, the potential

income tax on the excess of VAT collection on the used car trade (KLU 45104) from 2010 (April to December) to 2019 is Rp618.272.332.877.

When compared with the tax revenue target is 2019, the potential income tax on the excess VAT difference in used motorbike trade (KLU 45404) can increase tax revenue by 0.02% and 0.03% for used car trade (KLU 45104). The potential for income tax on the excess of VAT collection is quite large so that a legal basis is needed so that potential exploration can be carried out optimally and with legal certainty. The tax officer should pay attention to this. If not strictly regulated, loopholes that do not have legal certainty will be exploited by irresponsible parties to avoid taxes.

6. IMPLICATIONS

Before PMK No.79/2010 was enacted, VAT for used motor vehicles was collected based on the DPP Other Value mechanism regulated in KMK No.251/2002. The tax base referred to is 10% of the selling price. In KMK No.251/2002, it is stated that the input tax on the BKP/JKP acquisition cannot be credited because it has been calculated in the DPP another value of 10% of the selling price. Thus, PKP for used motor vehicle sales collects VAT from consumers upon delivery of 1% of the selling price. The amount of 1% of the selling price is deposited in the state treasury so that there is no residual value for the collection of VAT.

Meanwhile, the policy on the VAT collection mechanism for the retail sales of used motorized vehicles was changed to the credit guidance mechanism (deemed) on April 1, 2010. According to the results of interviews conducted by the author with sources from the Sub-Directorate of Industrial VAT, Directorate General of Taxes, the background of this policy change is the difficulty of administering the input tax on the acquisition of used motor vehicles by entrepreneurs. Also, verification or testing of the validity of input tax documents that can be credited by PKP is considered difficult. Therefore, the general mechanism cannot be applied to the

business activities of selling used motorbikes at retail, and a VAT In crediting guideline mechanism is imposed deemed tax.

With the enactment of PMK No.79/2010, PKP for used motor vehicle sales can credit an input tax of 90% of the output tax. An output tax of 10% of the selling price is collected when the used motor vehicle is delivered to the consumer. So, the VAT payable that must be deposited by PKP in the state treasury is 1% of the selling price. As a result, there was a difference of more than 9% of the business turnover that was not deposited by PKP in the state treasury.

By the test using debt write-off or exemption, the excess of VAT collection on the retail sale of used motor vehicles is income. However, there are no further regulations regarding this matter. According to the observations and answers of the informants from the Directorate General of Taxes, this excess is not the object of income tax, so it is assumed that the Direktorat Jenderal Pajak does not monitor this excess. Therefore, this difference of over 9% is a potential income tax.

Therefore, the Directorate General of Taxes can review PMK Number 79 of 2010 which results in a difference of more than 9%. Harmonization of regulations is needed so that there is synchronization between VAT (PPN) and income tax (PPh) regulations related to the tax treatment of this excess. Direktorat Jenderal Pajak can issue regulations in the form of a Regulation of the Director-General of Taxes or a Circular of the Director-General of Taxes related to the confirmation of this excess taxation aspect. By emphasizing the taxation of this excess difference, the potential for income tax on the excess of VAT can be explored optimally and is useful for increasing state revenues.

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