

EQUALIZATION WITHOUT SECURITY: VEHICLE TAX REASSIGNMENT ACROSS 35 INDONESIAN LOCAL JURISDICTIONS

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ABSTRACT

Studies of tax assignment reform usually evaluate the tier that surrenders a revenue instrument. The distribution of transferred revenue among receiving jurisdictions, and the vulnerability that receiving it creates, are rarely examined together. This article does so for Indonesia's surcharge (*opsen*), introduced by Law No. 1 of 2022 and effective from 5 January 2025, which reassigned 66 per cent of motor vehicle tax and vehicle transfer duty from provinces to regencies and cities. Using reported revenue for all 35 jurisdictions of Central Java Province for fiscal years 2024 and 2025, three results follow. First, the reform was strongly equalizing: the Gini coefficient of local tax revenue fell from 0.4361 to 0.3858, and would have risen to 0.4481 without the surcharge. Second, equalization was purchased at the price of concentrated exposure: mean dependence reached 37.0 per cent of local tax revenue, to a maximum of 67.4 per cent, and dependence is inversely related to pre-reform tax capacity ($r = -0.50$), so the fiscally weakest jurisdictions became the most reliant on revenue they neither assess nor collect. Third, the aggregate increase of 43.9 per cent conceals contraction: in 18 of 35 jurisdictions, revenue from locally administered tax bases fell in absolute terms. The article argues that assignability — the vulnerability of a revenue entitlement to unilateral statutory change by a higher tier — transfers downward with the revenue, and that reforms judged only on distributional criteria understate the risk they create.

1. INTRODUCTION

When a central legislature reassigns a tax handle from one tier of government to another, the question usually asked is whether the receiving tier gains. The answer is normally yes, and the analysis stops. Yet a reassignment is not a single event with a single beneficiary. It is a distribution across many receiving jurisdictions, each gaining a different amount for reasons that have little to do with its own effort, and each acquiring, along with the money, a dependence on a legal entitlement it does not control.

Indonesia's Law No. 1 of 2022 on Financial Relations between the Central Government and Regional Governments provides an unusually clean setting in which to examine both consequences at once. From 5 January 2025 the law introduced an *opsen*, or surcharge, under which regencies and cities levy a charge equal to 66 per cent of the provincial motor vehicle tax (PKB) and vehicle transfer duty (BBNKB) assessed within their territory. The surcharge is collected at the same counter, on the

same transaction, by the same provincial apparatus, and credited to the district treasury on the day of payment. Nothing about the taxpayer's obligation changed. What changed was the destination of two-thirds of it.

Central Java Province offers a case in which the arithmetic is unusually complete. The province has 35 regencies and cities, its provincial accounts are audited and published, and district-level revenue is reported to the national fiscal information system for every jurisdiction without exception. The province's own loss has been documented: provincial tax revenue fell 19.51 per cent in the first year of the surcharge. What has not been examined is where the money went, and what receiving it did to the fiscal position of the 35 jurisdictions that received it.

The research gap this article addresses lies between three literatures that do not meet. Tax assignment scholarship asks which tier should hold which instrument. Transfer scholarship examines how receipts from above affect the fiscal behaviour of the tier below. Equalization scholarship asks how disparity among governments at the same tier should be reduced. None supplies an account of what a receiving government holds after a reassignment — not how much, but on what terms.

The article therefore asks three connected questions. Did the reassignment reduce or widen horizontal fiscal disparity among receiving jurisdictions? What dependence did it create, and in which jurisdictions? And did the revenue it delivered mask, or reveal, movement in the tax bases those jurisdictions administer themselves? The answers do not point in the same direction, which is the article's substantive contribution, and the construct proposed to connect them — assignability — is its conceptual one.

2. LITERATURE REVIEW

2.1 Tax assignment and the surcharge instrument

The normative theory of tax assignment is settled in outline: mobile bases belong to higher tiers, immobile bases may be devolved, and subnational governments should control some instrument at the margin so that the cost of local spending is visible locally (Bahl & Bird, 2008; Bird, 2011). Motor vehicle taxation sits awkwardly within it, since registration is geographically fixed but administered through a centralized apparatus whose scale economies argue against duplication.

The surcharge, or piggyback, resolves the tension by separating entitlement from administration: a lower tier levies a fixed proportion of a base assessed and collected by a higher tier. Bahl and Bird (2018) treat the arrangement as orthodox. Agrawal and Shybalkina (2024), examining how remittance rules shape the distribution of local sales tax revenue in the United States after Wayfair, demonstrate that the administrative rule determining where revenue is credited can matter as much to distribution as the tax base itself — a finding directly applicable to a surcharge credited by place of vehicle registration. Sen and Wallace (2022), analysing India's subnational value added tax, show that revenue productivity under a shared instrument depends on collection effort the beneficiary may not control.

What the instrument literature does not address is the distribution of a surcharge across many simultaneous recipients. In most applications the receiving tier is one government. Where it is several hundred, the reassignment is also, unavoidably, an equalization or disequalization event determined by the geography of the base.

2.2 Equalization as a by-product of assignment

Equalization is normally pursued through transfers rather than assignment, because assignment allocates a base wherever it lies and bases are unevenly distributed. Bury, Feld and Burret (2024), quantifying the incentive properties of the German equalization scheme across five decades, show that equalizing formulas embed implicit marginal tax rates on local revenue effort. Alves and Araujo (2024) and Bernardelli, Paschoalino, Russo and Kortt (2026) find for Brazilian municipalities that transfers alter local fiscal incentives in ways the design did not intend, while Porto, Puig and Vidal (2026) show that subnational budgets adjust dynamically rather than immediately to transfer changes.

The disincentive result is not universal. Cohen (2023) finds subnational aid can crowd in rather than crowd out own revenue; Giertz and Kumar (2023) report substantial local multipliers from federal grants; and Collazos-Ortiz and Schakel (2023) show that administrative efficiency conditions whether Colombian municipalities convert resources into fiscal effort. Aikins (2023) demonstrates that intergovernmental revenue shapes how far local governments draw on reserves under stress. The common structure of these findings is that the effect of external revenue depends on the recipient's capacity and on the terms of receipt, not on the amount alone.

This yields a determinate empirical question for a surcharge. If the transferred base is distributed more evenly across recipients than the base they already hold, the reassignment equalizes; if less evenly, it concentrates. Vehicle ownership follows population, which is less concentrated than the commercial bases on which Indonesian districts have relied. The prediction is therefore equalization, and Section 4 tests it.

2.3 Assignability: definition and conceptual framework

Fiscal autonomy is measured as the share of expenditure financed from own sources. The measure records how much a government raises and is silent on how securely it holds it. This article proposes assignability to capture the second property: the vulnerability of a revenue entitlement to unilateral statutory change by a higher tier, observed as the share of revenue derived from bases the holder neither legislates nor administers.

Assignability is not the inverse of autonomy, and the two can move in opposite directions. A jurisdiction may raise a large share of its budget from own sources while holding that revenue on terms it cannot defend. Nor is assignability the same as transfer dependence, the property Rodden (2002) associates with weakened fiscal discipline: a transfer is recognized as external by the recipient and by the accounting system, whereas a surcharge is recorded as own-source revenue and is therefore invisible to the standard measure. Iacuzzi, Padovani and Canestrini (2025) find across

countries that fiscal autonomy does not reliably improve local financial health, a result difficult to reconcile with autonomy being straightforwardly good and easy to reconcile with autonomy being heterogeneous in its security.

Three recent literatures support treating it as distinct. Work on fiscal capacity and institutions establishes that the durability of a revenue position depends on the political arrangements underpinning it (Masi, Savoia & Sen, 2024; Henriques, Karaman & Palma, 2026). Work on administrative capacity establishes that a government's ability to replace lost revenue depends on apparatus it must already possess (Kim & Kang, 2024; Pill, 2024; Tran & Dollery, 2022; de la Riva Agüero, 2021). And work on veto players finds that revenue mobilization responds non-linearly to the number of parties whose consent collection requires (Yabré, Loaba & Semedo, 2025). Singh and Dubey (2026) show that shock transmission depends on the composition of the affected revenue rather than on its level, and Saens, Cox and Villalobos (2026) find behavioural responses to external revenue conditioned by fiscal capacity.

Two propositions follow, and the remainder of the article examines them. First, a surcharge on an evenly distributed base equalizes revenue across recipients. Second, it raises assignability most in the jurisdictions with least prior capacity, because those jurisdictions have the smallest base against which the new revenue is measured. If both hold, equalization and security diverge, and a reform assessed on the first alone will be misread.

3. METHOD

3.1 *Research setting*

Law No. 1 of 2022 restructured subnational taxation along two axes: it rationalized the list of permissible local taxes, and it introduced the opsen. Under Articles 81 and 83, regencies and cities levy a surcharge of 66 per cent on the principal amount of provincial motor vehicle tax and vehicle transfer duty arising within their boundaries. Provincial Regulation No. 12 of 2023 gave effect to the arrangement in Central Java, setting the principal rate for first vehicles at 1.05 per cent (Article 8) and the transfer duty at 10 per cent (Article 14).

Three design features matter. Collection is unified: the taxpayer pays a single amount at a single counter operated by the provincial revenue agency through the joint Samsat offices, and the surcharge is split at the point of receipt. The base is geographic and fixed: liability attaches to the jurisdiction of registration, so a district's entitlement is determined by the vehicles registered within it rather than by anything the district does. And arrears follow the same rule: where a liability is unpaid, 66 per cent of the uncollected amount is a district receivable that only the province can pursue.

3.2 Design, data and measures

The design is a complete-population cross-sectional comparison of two fiscal years. The analysis covers all 35 regencies and cities of Central Java Province for fiscal years 2024 and 2025. No jurisdiction is excluded and no observation is missing.

Local revenue data are drawn from the Regional Financial Information System (SIKD) maintained by the Directorate General of Fiscal Balance, at the December cumulative reporting period, which the system documentation confirms covers the full financial year. Two series are used: own-source revenue and local tax revenue, both at realization rather than budget. These are figures reported by each local government to the national system and are not audited.

Surcharge entitlements are derived from the provincial revenue agency's published operational dashboard, which reports principal motor vehicle tax and transfer duty target and realization for each of the 37 revenue service units covering the province, with the three units serving the provincial capital aggregated to a single jurisdiction. Because the statutory surcharge is a fixed 66 per cent of the principal, a district entitlement can be derived arithmetically from reported principal collection. Derived rather than reported figures are used because no single official document publishes surcharge realization for all 35 jurisdictions.

The derivation was validated in two ways. Aggregating the derived surcharge target reproduces the total in the provincial legislature's policy study to within IDR 1 million on a base of IDR 4.56 trillion. Independently, the total derived surcharge realization of IDR 3,734.00 billion is compared against the observed increase in local tax revenue across the 35 jurisdictions of IDR 3,615.20 billion — a correspondence of 96.8 per cent.

Vehicle registration counts by jurisdiction for 2025 are taken from the provincial statistics office, sourced from the traffic police. Three measures are constructed. Dependence is derived surcharge realization as a percentage of local tax revenue in 2025. Counterfactual tax revenue is 2025 local tax revenue less derived surcharge realization. Surcharge yield per registered vehicle expresses the entitlement relative to the physical base. Dispersion is measured by the Gini coefficient and the coefficient of variation, computed across jurisdictions on unweighted revenue totals.

Three limitations should be stated. The district revenue data are unaudited and remain subject to revision. The surcharge realization figures are derived rather than directly reported, and where individual jurisdictions have published their own outturn the correspondence varies. Three cities show reported principal collection far above target, which suggests an allocation anomaly between service units. Conclusions are therefore drawn from distributional patterns across the full set rather than from individual jurisdiction values.

4. RESULTS AND DISCUSSION

4.1 Magnitude and composition

The 35 jurisdictions received a surcharge entitlement with a combined target of IDR 4,555.83 billion and a derived realization of IDR 3,734.00 billion, an attainment of 82.0 per cent. Against this, local tax revenue rose from IDR 8,234.81 billion to IDR 11,850.01 billion, an increase of 43.9 per cent, and own-source revenue rose 20.9 per cent.

The relation between these figures is the first result. The derived surcharge realization exceeds the entire observed increase in local tax revenue, at 103.3 per cent of it. The surcharge did not supplement growth in local taxation; it constituted more than the whole of it. Table 1 sets out the aggregate position for both years.

Table 1. Aggregate position of 35 jurisdictions, FY2024 and FY2025 (IDR billion)

Item	2024	2025	Change
Own-source revenue (PAD)	19,346.46	23,384.03	+20.9%
Local tax revenue	8,234.81	11,850.01	+43.9%
Increase in local tax revenue	—	3,615.20	—
Surcharge entitlement (target)	—	4,555.83	—
Surcharge realization (derived)	—	3,734.00	82.0% of target
Surcharge as share of tax increase	—	103.3%	—

Source: Directorate General of Fiscal Balance, Regional Financial Information System, December cumulative period, FY2024 and FY2025; Central Java Regional Revenue Agency operational dashboard. Revenue figures are reported by local governments and are unaudited.

4.2 The reform was equalizing

The distributional result is unambiguous and runs against the ordinary expectation for an assignment reform. The Gini coefficient of local tax revenue fell from 0.4361 in 2024 to 0.3858 in 2025, and the coefficient of variation fell from 1.502 to 1.280.

The counterfactual sharpens the finding. Removing the derived surcharge from 2025 revenue leaves the tax revenue each jurisdiction raised from bases it administers itself. The Gini of that counterfactual distribution is 0.4481 — higher than the 2024 figure. Disparity was widening on the pre-existing base. The surcharge did not merely reduce disparity; it reversed a widening trend.

The mechanism is visible in the dispersion of the surcharge itself. Its Gini is 0.2751, well below the 0.4361 of the tax base it was added to, and close to the 0.2497 Gini of registered vehicles. Because the entitlement tracks the vehicle stock almost exactly ($r = 0.92$) and vehicles are distributed far more evenly than commercial tax bases, adding the surcharge to a concentrated base necessarily flattened the total. Table 2 reports what that flattening did to the dispersion of local tax revenue.

Table 2. Dispersion of local tax revenue across 35 jurisdictions

Distribution	Gini	CV	Note
Local tax revenue, 2024	0.4361	1.502	Pre-reform
Local tax revenue, 2025	0.3858	1.280	Post-reform
Counterfactual: 2025 less surcharge	0.4481	—	Locally administered bases
Surcharge entitlement, 2025	0.2751	—	Equalizing component
Registered vehicles, 2025	0.2497	—	Physical base

Source: computed by the authors from the sources for Table 1, fiscal years 2024 and 2025, and Central Java Provincial Statistics Office vehicle registration counts 2025 (retrieved 2026).

The equalizing effect is not uniform in its incidence. Surcharge yield per registered vehicle averages IDR 172,600 but ranges by a factor of 3.49, and the gradient is urban: six cities average IDR 273,400 per vehicle against IDR 151,700 in 29 regencies. Cities receive more per vehicle because their fleet is weighted toward passenger cars and transfer duty concentrates where dealerships are located. Equalization therefore operates at the level of totals rather than of rates.

4.3 Dependence is concentrated where capacity is weakest

The second result qualifies the first. Mean dependence across the 35 jurisdictions is 37.0 per cent of local tax revenue, with a median of 36.6, a minimum of 18.5 and a maximum of 67.4 per cent. More than a third of the local tax revenue of the average jurisdiction now derives from a base it does not assess, collect or enforce.

The distribution of that dependence is the finding. Dependence is inversely related to pre-reform tax capacity: the correlation with 2024 local tax revenue is -0.50 . Kota Magelang, whose 2024 tax revenue was IDR 58.99 billion, now derives 67.4 per cent of its tax revenue from the surcharge; Kota Semarang, at IDR 2,196.95 billion, derives 18.5 per cent. Table 3 lists the jurisdictions at each end of the dependence range.

Table 3. Surcharge dependence, highest and lowest jurisdictions (IDR billion)

Jurisdiction	Tax 2024	Tax 2025	Surcharge	Dependence
Kota Magelang	58.99	84.18	56.75	67.4%
Wonogiri	76.96	149.48	77.48	51.8%
Pati	168.01	320.68	148.00	46.2%
Blora	92.16	144.35	64.81	44.9%
Purbalingga	86.01	154.68	69.03	44.6%
Batang	162.42	236.60	63.06	26.7%

Jurisdiction	Tax 2024	Tax 2025	Surcharge	Dependence
Sukoharjo	325.76	462.20	123.33	26.7%
Kota Semarang	2,196.95	2,736.96	505.94	18.5%
All 35 (mean)	235.28	338.57	106.69	37.0%

Source: computed as for Table 1. Correlation between dependence and 2024 local tax revenue across all 35 jurisdictions is -0.50 .

This is the precise sense in which equalization and security diverge. The transfer narrowed the gap in revenue by giving proportionately more to jurisdictions with less. But proportionately more, from a source held on terms the recipient cannot defend, is a different asset from the same amount raised on a base the recipient administers. The jurisdictions that gained most in level terms are least able to absorb a subsequent statutory change and least equipped — having no vehicle register, no assessment function and no enforcement capability — to substitute for the revenue if it were withdrawn.

4.4 *The increase conceals contraction*

The third result is least visible in aggregate reporting. Removing the surcharge from 2025 revenue and comparing the remainder with 2024 shows that in 18 of the 35 jurisdictions, tax revenue from locally administered bases fell in absolute terms during the year the surcharge arrived.

The headline figure is a 43.9 per cent increase. The underlying position in a majority of jurisdictions is that the taxes they assess and collect themselves — on land and buildings, hotels and restaurants, entertainment, street lighting — yielded less than in the previous year. The surcharge did not merely dominate the increase; in half the province it substituted for decline.

This article does not establish why. Two mechanisms are consistent with the pattern and cannot be distinguished with these data. The first is displacement of administrative attention, an effect analogous to the transfer-dependence relationship Rodden (2002) documents and which Lewis and Smoke (2017) find operating in the Indonesian transfer system. The second is that the 2022 law simultaneously rationalized the list of permissible local taxes, so part of the decline may be statutory rather than behavioural. Distinguishing them requires disaggregation by tax type that the reporting system does not publish.

Two mechanisms in the recent literature sharpen what is at stake. Bagchi (2025) shows that introducing withholding on a local income tax raises compliance sharply, because collection at source removes the taxpayer's discretion over remittance. The surcharge operates on this principle, and its yield is correspondingly reliable; the same feature means the receiving jurisdiction learns nothing about its taxpayers and builds no collection capability. Rachevski and Shami (2024) find that local revenue performance improves where the business environment and taxpayer satisfaction improve, a capability built through sustained local effort rather than delivered by statute.

Whether the jurisdictions could have offset the decline is a separate question. Baskaran (2021), exploiting a quasi-experiment in local tax rates, finds that rate increases raise revenue but erode the

base. Wei (2021) shows that where state-level constraints bind, local overrides produce measurable but bounded fiscal effects. Both suggest that the room available on remaining instruments is narrower than a nominal comparison of rate ceilings would indicate, and both caution against reading the decline as straightforward neglect.

4.5 Discussion

The three results describe a reform that succeeded on the criterion by which it will be judged and created a condition that criterion does not capture.

The equalizing outcome deserves emphasis because it was not the reform's stated purpose and is not the ordinary result of an assignment change. The surcharge equalized because the base chosen happens to be distributed more evenly than the commercial bases Indonesian districts had relied on. Martinez-Vazquez, Lago-Peñas and Sacchi (2017) note that assignment reforms and equalization schemes are conventionally studied apart even though a reassignment carries an unavoidable distributional effect; the present case shows why the separation is untenable. Doan (2026), analysing 79 countries, finds decentralization associated with reduced compliance burden, indicating that a reassignment need not degrade administration at the point of collection.

The cost is a structural exposure that the standard measure of fiscal autonomy conceals. Own-source revenue as a share of total revenue rose for every one of the 35 jurisdictions, and on that measure all became more autonomous. But 37 per cent of the average jurisdiction's tax revenue now rests on a national statute it cannot influence and cannot administratively replace. The province's experience is the warning: it entered 2025 with 79.2 per cent of its tax revenue concentrated in vehicle-related instruments, an exposure that looked like strength until one law removed two-thirds of it.

Two policy implications follow with reasonable directness. First, the arrears problem is structural rather than incidental: because 66 per cent of every unpaid vehicle liability is a district receivable that only the province can pursue, no jurisdiction has both the interest and the means to collect it. The finding of Yabré, Loaba and Semedo (2025), that revenue performance declines beyond an optimum number of parties whose consent collection requires, applies directly. Second, jurisdictions with dependence above 45 per cent hold a fiscal risk position their own budget documents do not disclose, since the surcharge appears as local tax revenue indistinguishable from revenue they raise themselves. Separate disclosure would be a modest and immediate improvement.

The distributional result also has a spatial dimension the present data cannot resolve. Vincent and Osei Kwadwo (2022) demonstrate that fiscal grants generate spillovers between neighbouring jurisdictions, so a jurisdiction's position depends partly on its neighbours'. A surcharge assigned by place of registration is open to the same effect. Lucidi (2022) shows that fiscal multipliers vary across regions within one country, and Henri and Junior (2026) find revenue mobilization contingent on economic composition; both imply that the distributional finding understates variation in what the transferred revenue will accomplish once spent. Apeti and Edoh (2023) and Giacobbe, Mosca, Ordine and Rose (2026) locate further determinants of local collection in payment infrastructure and in

grant receipt respectively, and Krishna Chaitanya and Roberto (2026) show that external funds produce unintended consequences for fiscal transfers.

A third implication commonly advanced in the Indonesian policy literature — that jurisdictions should build independent revenue capacity to reduce dependence — does not follow from these data. The evidence establishes that dependence exists and is concentrated. It does not establish that the receiving jurisdictions could raise significant revenue from alternative bases if they tried, and the finding that locally administered revenue fell in 18 of 35 jurisdictions is at least as consistent with those bases being exhausted as with them being neglected. Del Castillo and Cabral (2024) find that subnational fiscal rules constrain the borrowing route by which a shortfall might otherwise be bridged, and Yu, Kim and Sim (2022) show fiscal capacity conditioning the scope of local response.

4.6 Policy implications

Three implications follow for the design and oversight of assignment reforms, and each is stated as an action rather than as an observation because the evidence supports that much.

The first concerns what a receiving jurisdiction should be required to disclose. Mean dependence on the surcharge reached 37.0 per cent of local tax revenue and a maximum of 67.4 per cent, and dependence is inversely related to pre-reform capacity at $r = -0.50$. A jurisdiction in that position holds a revenue stream it does not assess, collect or enforce, and whose statutory basis a higher tier may alter. Requiring each receiving jurisdiction to report, alongside its budget, the share of local tax revenue arising from instruments it does not administer would put the exposure in front of the council that approves the budget. The figure is already computable from data the jurisdictions hold; what is absent is the obligation to present it.

The second concerns the equalization achieved. The reform reduced the Gini coefficient of local tax revenue from 0.4361 to 0.3858 against a counterfactual of 0.4481, which is a substantial equalizing effect obtained without a transfer formula and without any distributional intention appearing in the statute. Where a government seeks equalization, this indicates that the crediting rule attached to an assignment is a usable instrument and should be assessed for its distributional effect before adoption, since the effect is computable in advance from the two distributions involved. Where a government does not seek equalization, the same point applies in reverse: a crediting rule keyed to a concentrated attribute will concentrate, and the outcome will not be attributable to any decision anyone recorded taking.

The third concerns the eighteen jurisdictions whose revenue from locally administered tax bases fell in absolute terms while their headline local tax revenue rose. An oversight framework reading only the headline records improvement in all thirty-five. Reporting revenue from self-administered instruments separately from surcharge entitlement would distinguish the two, and it is the minimum needed for a supervising tier to detect a jurisdiction whose own revenue capacity is contracting behind a rising total.

5. CONCLUSION

Reassignment of a tax handle from a provincial government to its 35 constituent jurisdictions produced, in its first year, a substantial reduction in horizontal fiscal disparity, reversing a trend that was moving the other way. It also produced a mean dependence of 37 per cent on a revenue stream the recipients do not administer, distributed inversely to their pre-existing capacity, alongside absolute decline in locally administered tax revenue in a majority of them.

The general claim is that assignability travels with the revenue. When a higher tier surrenders a tax handle, it surrenders the associated vulnerability as well, and that vulnerability comes to rest wherever the revenue does — typically, as here, distributed in inverse proportion to the capacity to bear it. Assessment frameworks built on autonomy measures will not detect this, because autonomy and security move independently and the reform improved one while degrading the other.

Three limitations bound the conclusions. The district revenue data are unaudited; the surcharge realization is derived rather than reported; and the analysis covers a single post-reform year. Three extensions would accordingly strengthen the argument. Disaggregating local tax revenue by instrument would separate statutory from behavioural explanations of the decline in locally administered revenue. Extending the analysis to a second and third year would establish whether the equalizing effect persists once the transition is complete. And replication in provinces with different urban structure would test whether the equalizing result is a property of the surcharge instrument or of Central Java's particular distribution of vehicle registration.

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