

REPUBLIC OF KENYA
PUBLIC PROCUREMENT ADMINISTRATIVE REVIEW BOARD

APPLICATION NO. 11/2013 OF 22ND MARCH, 2013

BETWEEN

OPTILAN (UK) LIMITED.....APPLICANT

AND

**KENYA AIRPORTS AUTHORITYPROCURING
ENTITY**

Review against the decision of the Tender Committee of KENYA AIRPORTS AUTHORITY in the matter of Tender No: KAA/ES/JKIA/811/E for the SUPPLY AND INSTALLATION OF CCTV SURVELLANCE SYSTEM AT JKIA.

BOARD MEMBERS PRESENT

Mr. P. M. Gachoka	- Chairman
Mr. Akich Okola	- Member
Eng. Christine Ogut	- Member
Mrs. Loise Ruhiu	- Member
Mr. Joshua W. Wambua	- Member

IN ATTENDANCE

Mr. Philemon Chemoiywo - Holding Brief for Secretary

Ms Judith Maina - Secretariat

PRESENT BY INVITATION

Procuring Entity - Kenya Airports Authority

Mr. George Kamau -legal counsel

Mr. Allan Muturi -General Manager Procurement & logistics

Mr. Jonah Biwott -Procurement Assistant

Mr. Charles Cheboi -T.L.A.S.A

Mr. Margaret Muraya. -Manager Project

Mr Mwasela -T.L.A.S.A

Interested Parties

Mr. Evans Mwaura -Director, Com21

ABSENT

Applicant - Optilan (uk) limited

BOARD'S DECISION

Upon hearing the submissions of the parties and interested candidates and upon considering the information in all the documents before it, the Board decides as follows:

BACKGROUND OF AWARD

1. The tender for Supply and Installation of CCTV Surveillance System at Jomo Kenyatta International Airport was advertised in the print media as from 1st August 2012.

2. Opening/closing

The bids closed on 27th August, 2012 and opened on 10th September 2012 through an addendum.

3. Scope of work

The scope under this contract includes the supply, delivery, installation, configuration, testing CCTV Surveillance system as per specifications leaving an enhanced CCTV System at Jomo Kenyatta International Airport Nairobi Kenya. The scope shall include;

1.1.1 Supply and install IP CCTV Surveillance system and related

5.1 Components at Jomo Kenyatta International Airport, comprising of:

- IP Indoor D/N PTZ cameras
- IP Fixed Bullet D/N cameras
- IP PTZ network Thermal cameras – wireless and wired
- IP fixed dome D/N cameras with zoom component

- System Servers
- Workstations
- Video analytics software
- Software Module (server side, client side and video analytics)
- Uninterrupted Power Supply for the system
- Storage media resource for recorded video feeds

1.1.2 Replacing all eight (8) wireless PTZ cameras at the airside with PTZ thermal Cameras utilizing the existing wireless infrastructure (Wireless link, Masts, aviation lights, cabling, and power feeds).

1.1.3 Testing and commissioning of the complete system installation.

1.1.4 Training of technical, administration and security personnel.

4. Bidder who responded

Out of 45 bid documents sold only 19 submitted their bids as follows: -

	Bidder's Name	Amount Quoted	Amount in Kshs	Tender Surety
1	H. F. Fire International (K) Ltd	63,316,661.98	63,316,661.98	Provided
2	Orad Control Systems	USD 2,678,614.00	225,911,358.28	Provided
3	Horsebridge Network System (EA)	181,000,310.02	181,000,310.02	Provided
4	Central Electrical International Ltd	119,847,702.83 (From Price Schedule)	119,847,702.83	Provided

	Bidder's Name	Amount Quoted	Amount in Kshs	Tender Surety
5	Azicon Kenya Limited	108,530,251.00	108,530,251.00	Provided
6	Magal Security System	USD 1,217,512.00	102,683,622.82	Provided
7	Gallatek (K) Limited	51,579,680.00	51,579,680.00	Provided
8	Optilan (UK) Ltd	132,504,543.00	132,504,543.00	Provided
9	G4S	254,586,800.80	254,586,800.80	Provided
10	Aviation & General Security Consultants	USD 1,669,537.88 (From Price Schedule)	140,806,988.31	Provided
11	Akkad Systems Limited	STP 1,771,495.16	238,991,703.44	Provided
12	AUA Industria Limited	153,337,219.39	153,337,219.39	Provided
13	Micro-City Computers Limited	164,857,019.20	164,857,019.20	Provided
14	Teledata Technologies Limited	148,017,064.49	148,017,064.49	Provided

	Bidder's Name	Amount Quoted	Amount in Kshs	Tender Surety
15	Com Twenty One Limited	118,895,404.53	118,895,404.53	Provided
16	Equip Agencies Limited	600,784,340.00	600,784,340.00	Provided
17	Autobacs Limited	129,803,306.78	129,803,306.78	Provided
18	Radar Limited	99,550,736.00	99,550,736.00	Provided
19	Servetel Communication Ltd	135,333,071.22	135,333,071.22	Provided

KAA ESTIMATE

185,298,400.00

5. EVALUATION

Evaluation for this tender was concluded in September, 2012 and Subsequently award was made to the responsive bidder via letter dated 17th October, 2012. However M/s Magal Security Systems who was one of the unsuccessful bidders successfully appealed against the award and the Public Procurement Administrative Review Board nullified the award and ordered re-evaluation

The received bids were evaluated in three stages namely preliminary, technical and financial evaluation. The firms were subjected to the

evaluation to determine compliance with the requirements of the tender and they put into consideration the issues raised by the Applicant.

The results are as tabulated below: -

3.0 PRELIMINARY EVALUATION

The firm was subjected to preliminary evaluation to determine compliance with the requirements and the results are as tabulated below: -

Table 1 – Preliminary Requirements

	1	2	3	4	5	6	7	8	9	10
	H. F. Fire International (K) Ltd	Orad Control Systems	Horsebridge Network Systems (EA)	Central Electrical International Ltd	Azicon Kenya Limited	Magal Security Systems	Gallatek (EA) Limited	Optilan Ltd	G4S	Aviation & General Security Consultants
REQUIRED INFORMATION										
1	The Tenderer shall submit One (1) Original and One (1) Copy of the tender.	✓	✓	✓	✓	✓	✓	✓	✓	✓
2	Tender Surety of Kshs 2,000,000/= valid for 120 days from the date of tender opening in form of cash, bank guarantee, insurance guarantee with policy no, letter of credit	✓	✓	✓	✓	✓	✓	✓	✓	✓
3	Registration/Incorporation Certificate	✓	✓	✓	✓	✓	✓	✓	✓	✓
4	Power of Attorney of the signatory of tender to	✓	✓	✓	✓	✓	X	✓	X	✓

	1	2	3	4	5	6	7	8	9	10
	history in the format provided - tenderers with NONE to declare									
9	duly completed declaration form in the format provided - tenderise not debarred to declare	✓	✓	✓	✓	✓	✓	✓	✓	✓
10	duly completed site visit certificate as issued during site visit/pre bid meeting	X (Not attached)	✓	X (Not Provided)	✓	✓	✓	✓	X	✓
11	duly completed and signed form of tender	✓	✓	X (Not filled)	✓	✓	✓	✓	✓	X (not complete)
	Category "A" & "B" registration with Ministry of public works in installation of CCTV Security surveillance system	X (Category E)	X (Provided General Building Works and Civil Engineering Category D)	✓ (from Integrated Fire & Safety Solutions)	✓	✓ (Have attached a copy from M/s Azicon who are also participating in this Tender)	X	X (Not Provided)	X	X (Not Provided - Indicated that they do not fall under the category)
RESPONSIVENESS										
	Overall Responsiveness	NO	NO	NO	YES	YES**	NO	NO	NO	NO

	11	12	13	14	15	16	17	18	19
	registered accountant and supported by copies of tax returns								
6	Certified copies of CV's and certificates of key personnel herein referred to as project team members in the management and implementation of the project,	✓	✓	✓	✓	X (Not Provided)	✓	✓	✓
7	duly completed manufacturer's authorization form in the format provided	✓	✓	X (Provided from Delta Energy, Coralipx, Speech Technology Center but not as per the provided format)	✓	✓	✓	X (Provided from Lillin, Protea Group, Ogier Electronics but not as per the provided format)	✓
8	duly completed form of litigation and arbitration history in the format provided - tenderers with NONE to declare	✓	✓	✓	✓	✓	✓	✓	✓
9	duly completed declaration form in the format provided - tenderise not debarred to declare	✓	✓	✓	✓	✓	✓	✓	✓
10	duly completed site visit certificate as issued during site visit/pre bid meeting	✓	✓	✓	✓	✓	✓	✓	✓
11	duly completed and signed form of tender	✓	✓	✓	✓	✓	✓	✓	✓

	11	12	13	14	15	16	17	18	19
12	X	X (Not Provided)	✓	X (Category D)	X (Certificate for contractors indicating several categories lumped up together was submitted, Upon confirmation from Mow Website, Category C)	X (Attached Certificates for plumbing and drainage (Category A) and water tanks and water treatment Category C)	X (Attached General Building Works Category B from a Partner M/S H. K. Builders & General Contractors Ltd.)	X	X (Category E)
	RESPONSIVENESS								
	Overall Responsiveness	NO	YES	NO	NO	NO	NO	NO	NO

**** It is observed that Bidder No. 6 (M/s Magal Security Systems Ltd) has used Ministry of Public Works Registration Certificate from M/s Azicon Kenya Ltd who are also bidding in this tender.**

**** It is also observed that the Bidder has presented letters from Distributors and agents instead of Manufacturers for Key items in this tender against the requirements of this tender.**

3.1 Non-Responsive Firms

Sixteen (16) firms did not meet the preliminary requirements and the bids were not considered further. The reasons are as indicated below: -

No	Bidder Name	Reason
1	H. F. Fire International (K)	<ul style="list-style-type: none"> Provided Manufacturer's Authorization Letter from Axis which was not signed nor as per required format (not addressed or specific to the project), from GE Security not as per

No	Bidder Name	Reason
	Ltd	<p>format (not addressed or specific to the project)</p> <ul style="list-style-type: none"> • Provided Category "E" Registration with Ministry of public works in installation of CCTV Security surveillance system instead of the required Category "A" & "B" • Did not Provide Site Visit Certificate
2	Orad Control Systems	<ul style="list-style-type: none"> • Did not provide Category "A" & "B" registration with Ministry of public works in installation of CCTV Security surveillance system
3	Horsebridge Network Systems (EA)	<ul style="list-style-type: none"> • Provided General Building Works and Civil Engineering Category "D" instead of the required Category "A" & "B" registration with Ministry of public works in installation of CCTV Security surveillance system
4	Central Electrical International Ltd	<ul style="list-style-type: none"> • Did not Provide Site Visit Certificate • Did not fill Form of Tender
7	Gallatek Limited (EA)	<ul style="list-style-type: none"> • Did not provide Power of Attorney of the signatory of tender to commit the tenderee • Audited Financial Statements for 2008 not provided. Notes to the Accounts not provided • Did not provide CV's and certificates of key personnel • Did not provide Manufacturer's authorization Letters • Did not fill Litigation History • Did not provide Category "A" & "B" registration with Ministry of public works in installation of CCTV Security surveillance system
8	Optilan (UK) Ltd	<ul style="list-style-type: none"> • Did not provide Category "A" & "B" registration with Ministry of public works in installation of CCTV Security surveillance system.

No	Bidder Name	Reason
9	G4S	<ul style="list-style-type: none"> • Did not provide Power of Attorney of the signatory of tender to commit the tenderer. • Did not provide Manufacturer's authorization Letters • Did not provide Category "A" & "B" registration with Ministry of public works in installation of CCTV Security surveillance system • Did not Provide Site Visit Certificate
10	Aviation & General Security Consultants	<ul style="list-style-type: none"> • Did not provide Category "A" & "B" registration with Ministry of public works in installation of CCTV Security surveillance system - Indicated that they do not fall under the category • Provided Form of Tender that was NOT complete
11	Akkad Systems Limited	<ul style="list-style-type: none"> • Did not provide Category "A" & "B" registration with Ministry of public works in installation of CCTV Security surveillance system
12	AUA Industria Limited	<ul style="list-style-type: none"> • Did not provide Category "A" & "B" registration with Ministry of public works in installation of CCTV Security surveillance system
13	Teledata Technologies Limited	<ul style="list-style-type: none"> • Provided Manufacturer's Authorization Letter from Delta Energy, Coralipx, Speech Technology Center but not as per the provided format (not addressed or specific to the project) • Provided Category "D" Registration with Ministry of public works in installation of CCTV Security surveillance system instead of the required Category "A" & "B"
14	Com Twenty One	<ul style="list-style-type: none"> • The bidder provided Renewal Certificate for contractors indicating several categories lumped up together as Category "A". Upon confirmation from Ministry of Public Works Website on the list of "renewed contractors register as at 14th September 2012", the firm

No	Bidder Name	Reason
		was registered under Category "C" on Security Surveillance (CCTV) Intruder Alarms System, and Access Control against the requirement of Category "A" & "B". http://www.publicworks.go.ke/images/stories/registeraug2012.pdf
15	Equip Agencies Limited	<ul style="list-style-type: none"> • Did not provide CV's and certificates of key personnel • Attached Certificates for plumbing and drainage (Category "A") and water tanks and water treatment Category "C" instead of the required Category "A" & "B" registration with Ministry of public works in installation of CCTV Security surveillance system
16	Autobacs Limited	<ul style="list-style-type: none"> • Attached General Building Works Category "B" from a Partner M/S H. K. Builders & General Contractors Ltd instead of the required Category "A" & "B" registration with Ministry of public works in installation of CCTV Security surveillance system.
17	Radar Limited	<ul style="list-style-type: none"> • Provided Manufacturer's Authorization Letter from Liilin, Protea Coin Group, Ogier Electronics but not as per the provided format (not addressed or specific to the project) • Did not attach a Certificate from Ministry of Public Works Category A or B for CCTV installation works. Instead they attached category B for General Building Works.
18	Servetel Communication Ltd	<ul style="list-style-type: none"> • Provided Category "E" Registration with Ministry of public works in installation of CCTV Security surveillance system instead of the required Category "A" & "B"

3.2 Responsive Firms

Three (3) firms met the preliminary requirements and were considered in the technical evaluation. They are as follows: -

1. Azicon Kenya Ltd
2. Magal Security Systems
3. Micro City Computers Ltd

4.0 TECHNICAL EVALUATION

The two responsive firms were subjected to technical evaluation to determine compliance with the requirements and the results are as tabulated below: -

Table 4.1 – Technical Responsiveness

	REQUIRED INFORMATION	Azicon Kenya Ltd	Magal Systems Ltd	Micro City Computers Ltd
	REQUIRED INFORMATION			
1.1	<p>Demonstration of past experience and performance</p> <p>Bidders shall show proof of not less than three (3) projects on IP CCTV Surveillance undertaken successfully in the last five (5) years. A proof of a completion or commissioning certificates shall be attached.</p>	<p>No proof of past experience in IP CCTV surveillance projects.</p> <p>Not Complied</p>	<p>Bidder has provided 3 security projects where IP CCTV surveillance was a component. However no letter of commissioning or completion certificate is attached.</p> <p>Not Complied</p>	<p>Provided proof of more than 3 IP CCTV surveillance projects</p> <p>Complied</p>
1.2	<p>Installed in a Airport Environment</p> <p>Bidders shall provide documentary evidence that the proposed goods and system have been successfully supplied and installed in an airport environment for the last three (3)</p>	<p>None provided</p> <p>Not Complied</p>	<p>1No. Project at Libreville Airport, Gabon Africa cup of nations (50 cameras done in 2012, Value – US\$ 1.4m)</p>	<p>The bidder has proof for 3 IP projects carried out at Eldoret Intl' Airport and Moi International Airport</p> <p>Complied</p>

	REQUIRED INFORMATION	Azicon Kenya Ltd	Magal Systems Ltd	Micro City Computers Ltd
	years prior to this tender release.		Complied	
1.3	Compliance to Technical Specifications Bidders shall fill the table of compliance attached indicating whether equipment to be supplied complies with specifications.	The bidder has indicated that the equipment to be supplied meets the technical requirement Complied	The bidder has indicated that the equipment to be supplied meets the technical requirement Complied	The bidder has indicated that the equipment to be supplied meets the technical requirement Complied
1.4	Proof of Compliance to specifications Bidders shall show proof that the equipment to be installed in the project actually complies with the technical requirements attached.	The attached Brochures and specifications prove technical compliance Complied	The bidder's Optical zoom and digital zoom for D/N PTZ IP network camera does not comply (Requirement = x36, They have Provided - x18) Not Complied	The attached specifications and brochures prove that the equipment meet the specifications Complied
1.5	Proof of an agent in Kenya to support the equipment: All bidders not based in the country to provide proof of existence of agent to support the equipment.	This is a Local Firm Complied	Provided Complied	This is a local Company Complied

	REQUIRED INFORMATION	Azicon Kenya Ltd	Magal Systems Ltd	Micro City Computers Ltd
2.1	List of Project Key Personnel :A list of project team members shall be submitted complete with alternate candidates. A form is provided and MUST be duly filled.	The list not provided Not Complied	Attached Complied	Provided all the details as required Complied
2.1	Qualification and Experience of Project Key Personnel :Bidders shall provide the names of at least three candidates qualified to meet the specified requirements stated for each position. A minimum qualification of Bsc in ICT or Bsc in Electrical and Electronic Engineering for a project manager and a diploma in electronic & electronics or diploma in ICT for other key 2 project members. Attach certified copies of CV, Academic and professional certificates for the proposed project team.	Bidder has only Provided CVs No supporting certificates Not Complied	Bidder has only Provided CVs No supporting certificates Not Complied	Provided as required Complied
3.1	Financial position and capability – Liquid assets Tenderer's MUST show capacity to have access to lines of credit, other financial resources of Kenya Shillings eighty million	The bidder has not provided proof to access to lines of credit The bidder has partially filled the financial capabilities form	Provided the necessary proof	Current assets in excess of Kshs. 400million

REQUIRED INFORMATION	Azicon Kenya Ltd	Magal Systems Ltd	Micro City Computers Ltd
[Kshs. 80,000,000]. A form for Financial Capabilities attached to tender forms must be completed detailing the financial position, financial history, financial performance, financial focus and capability of every bidder.	Not complied	Complied	Complied
3.2 Financial position and capability - Turnover Minimum average annual turnover of Kenya shillings three hundred million [Kshs. 300,000,000] equivalents in the above 3 years calculated as total certified payments received for contracts in progress or completed, within the last three (3) years.	The average annual turnover is Kshs. 72 Million Not complied	Their Turnover is much higher than the tender requirements Complied	Average Annual turnover more than Kshs. 900million Complied
Overall Responsiveness	Not Complied	Not Complied	Complied

M/s Micro City Computers Ltd are responsive to the Technical evaluation Criteria and therefore proceed to Financial evaluation stage:

0 FINANCIAL EVALUATION

The financial proposal of the responsive bid was checked and tabulated as indicated below

				13	
				Micro-City Computers Limited	
NO	DESCRIPTION	UNIT	QTY	RATE	AMOUNT
1	Supply and install Indoor IP PTZ day/night IP Network cameras as per specifications.	No.	49	424,500	20,800,500
2	Supply, install and configure fixed IP Dome network cameras as per specifications	No.	27	320,800	8,661,600
3	Supply, install and configure bullet fixed network cameras as per specifications	No.	64	365,200	23,372,800
4	Supply, install and configure wireless PTZ Thermal Surveillance cameras specifications complete with battery backups to handle 6 hour transient time.	No.	11	2,750,200	30,252,200
5	Supply and install a wireless link system for video transmission for a radius of 5km	No.	4	375,000	1,500,000
6	Installation and configuring replaced IP PTZ Dome Wireless cameras within terminal building as directed by The Engineer.	No.	8	50,000	400,000
7	Supply, install and configure wired PTZ Thermal Surveillance cameras as per specifications	No.	6	2,570,200	15,421,200
8	Supply and install 10 meters triangular masts complete with aviation safety lights.	No.	4	550,000	2,200,000

				13	
9	Supply and install system servers complete with storage providing 24 terabyte providing a total of 128 terabytes of video storage. Three (3) of the six (6) servers shall be configured to provide redundancy	No.	6	1,350,000	8,100,000
10	Supply and install video management system software (VMS) both server side and client side as specified on all the 6 servers and six (6) workstations	No.	Sum		1,270,000
11	Supply and install Video analytics to realize the specifications provided.				-
12	Supply and install client workstation Computers with Monitoring client side video management system installed and configured	No.	6	160,500	963,000
13	Structural cabling: CAT 6 platinum core (Twisted-pair cabling) for connecting cameras to switches and use laser-optimized 50/125 μm multi-mode fiber (OM3)10 GB Ethernet as Fiber backbone to link all hubs.	No.	sum		5,610,320
14	Supply and install 24 port layer 3 video switches as per specifications	No.	14	326,750	4,574,500
15	Supply and install 40 inch display screens as per specifications.	No.	8	254,150	2,033,200
16	Supply and install video transceivers	No.	Sum		675,000
17	Design and deploy professional control room complete with:	No.	Sum		5,500,000
A	Access Control Facility				
B	Secured Rack				

				13	
C	CCTV Seats				
D	CCTV Console				
E	Telephone Facility (head sets)				
F	Air Conditioning				
G	Carpet				
18	Supply and install 40KVA Uninterrupted power supply to provide uninterrupted system operations	No.	Sum	2,750,600	2,750,600
19	Allow for factory technical training for the installed system for six (6) maintenance personnel.	No.	6	SUM	4,000,000
20	Allow for factory inspection and acceptance for four (4) nominated KAA officers.	No.	4	SUM	2,000,000
21	Allow for on-site system operators training for the installed system for fifty (50) KAA security personnel.	No.	50	FREE	-
22	SUB TOTAL				140,084,920.00
23	Add 16% VAT and any other applicable duty				22,413,587.20
24	TENDER SUM				162,498,507.20

7.0 RECOMMENDATIONS

The Evaluation Committee recommended that the lowest evaluated responsive bidder, **M/S Micro-City Computers Ltd**, be awarded the contract for **The Supply and Installation of CCTV Surveillance System at Jomo Kenyatta International Airport** at the corrected sum of **Kshs. 162,498,507.20 inclusive of VAT.**

9.0 THE TENDER COMMITTEE DECISION

The Tender Committee in its 236th meeting held on 21st February, 2013 deliberated on the recommendations of the Evaluation Committee .The Evaluation Committee recommended M/S MICRO-CITY COMPUTERS LTD to carry out the works at their quoted sum of KShs.162, 498,507.20 inclusive of VAT .The Tender Committee adjudicated and approved award as recommended.

REVIEW

The Request for Review was lodged on 22ND March, 2013 against the decision of Kenya Airports Authority dated 21st February, 2013 in the matter of Tender No: KAA/ES/JKIA/811/E for the SUPPLY AND INSTALLATION OF CCTV SURVELLANCE SYSTEM AT JKIA

The Applicant was NOT represented while the Procuring Entity was represented by Mr. George Kamau, legal Officer. The Interested Candidates present were Micro-city represented by Mr. Donald B.Kipkorir, and Com21, represented by Evans Mwaura, Director.

The Applicant had requested the Board for the following orders:

- i. *The decision of Kenya Airports Authority dated 8th March 2013 to disqualify M/s Optilan (UK) Ltd for failure to 'provide Category "A" and "B" registration with Ministry of Public works in installation of CCTV Security Surveillance System' be annulled;*
- ii. *The Decision to award Tender No. KAA/ES/JKIA/811/E to any other bidder be annulled;*
- iii. *Tender No. KAA/ES/JKIA/811/E; be awarded to M/S Optilan (UK) Ltd.*
- iv. *In the Alternative, and Without Prejudice to the foregoing, the decision of Kenya Airports Authority dated 8th March 2013 to disqualify M/s Optilan (UK) Ltd for failure to 'provide Category "A" and "B" registration with Ministry of Public works in installation of*

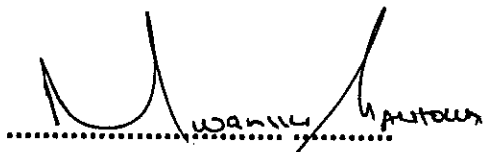
CCTV Security Surveillance System' be annulled, and the Procuring Entity ordered to evaluate the Applicant's Bid further.

v. The costs of these proceedings be awarded to M/s M/S Optilan (UK) Ltd

At the very outset of the hearing, the Board noted that neither the Applicant nor its advocate on record, were present at 2.30 pm when the hearing commenced as scheduled. The Board was informed by the Secretariat that it had earlier in the afternoon telephoned the advocate for the Applicant, and had been informed by the advocate that he would not be appearing for his client due to disagreement between himself and the client.

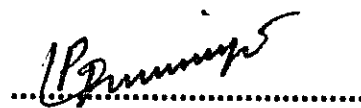
This notwithstanding, the Board decided to give the Applicant time to appear, and upon the Applicant or its advocate failing to appear by 3.30 pm, The Board in exercise of the power conferred on it by Regulation 80(2), dismissed the Application for want of prosecution.

Dated at Nairobi on this 15th day of April, 2013



CHAIRMAN

PPARB



Ag SECRETARY

PPARB