

**THE REPUBLIC OF UGANDA
PUBLIC PROCUREMENT AND DISPOSAL OF PUBLIC ASSETS APPEALS TRIBUNAL
(PPDA APPEALS TRIBUNAL)**

APPLICATION No. 15 OF 2017

APPLICATION FOR REVIEW OF THE DECISION OF PUBLIC PROCUREMENT AND DISPOSAL OF PUBLIC ASSETS AUTHORITY IN RESPECT OF TENDER OF ARUA TAXI PARK TENDER FY 2017.

APPLICANT: ARUA UNITED TRANSPORTERS SACCO

1st RESPONDENT: PUBLIC PROCUREMENT AND DISPOSAL OF PUBLIC ASSETS AUTHORITY (AUTHORITY)

2nd RESPONDENT: ARUA MUNICIPAL COUNCIL (ENTITY)

(Before: OLIVE ZAALE OTETE-CHAIRPERSON, MOSES JURUA ADRIKO-MEMBER, DAVID KABATERAINE-MEMBER AND ABRAHAM NKATA- MEMBER AND ARCHT. JOEL KATEREGGA-MEMBER.)

DECISION OF THE PPDA APPEALS TRIBUNAL

1.0 BRIEF FACTS

1. On 17th May 2017, Arua Municipal Council advertised the procurement of providers for the management of Arua Taxi Park for the period July 2017 to June 2018.
2. On 6th June 2017, two bids were received from Arua Taxi Operators Cooperative Savings and Credit Society Limited and Arua United Transporters Cooperative Savings and Credit Society Limited.
3. During the evaluation of bids, the Applicant was disqualified for lack of required experience and Arua Taxi Operators Savings and Credit Society Limited declared Best Evaluated Bidder (BEB) by notice displayed on 12th June 2017 to 23rd June 2017.
4. Dissatisfied with the decision of the Entity (2nd Respondent), on 15th June 2017, the Applicant lodged a complaint with the Entity's Accounting Officer.
5. On 7th July 2017, the Applicant lodged the same complaint for administrative review before the Authority on grounds that the Accounting Officer had failed and/or delayed to make a decision within the stipulated time.
6. On 10th July 2017, the Accounting Officer of Arua Municipal Council rejected the Applicant's complaint for administrative review.
7. On 7th August 2017, the Authority rejected the Applicant's complaint to the Authority.
8. Being dissatisfied with the Authority's decision, the Applicant filed this application before the Tribunal on 28th August, 2017.

2.0 APPLICATION FOR REVIEW OF THE AUTHORITY'S DECISION

- 2.1 On 28th August 2017, the Applicant applied to the Tribunal for a review of the Authority's decision to uphold Application No. 15 of 2017.
- 2.2 The Applicant sought for the contract to be awarded to the Applicant through direct procurement since it is the only qualified bidder under the reservation scheme following the fact that the Best Evaluated Bidder had already managed the taxi park for two years consecutively.
- 2.3 The Applicant sought for disciplinary action to be taken against Arua Municipal Council.
- 2.4 The Applicant also sought for costs of this Application.

3.0 DISPOSAL OF APPLICATION

In disposing of the Application for review, the Tribunal analyzed the following documents:

- 1) The Applicant's Application to the Tribunal dated 28th
 - 2) August 2017, annexes to the Application, the written and oral submissions.
 - 3) The 1st Respondent's (Authority's) response to the Application, annexes to the response, the written and oral submissions.
- 3.1 The Tribunal conducted a hearing for the Parties on 8th September 2017. The Applicant was represented by Counsel Waiswa Ramadhan the 1st while Respondent (Authority) was represented by Mr. John Kallemera.

4.0 SUMMARY DECISION

- 4.1 In accordance with Section 91 I (7) of the Act, the Tribunal delivered a summary of this decision on Tuesday 12th September 2017. What follows is the detailed reasoning in support of the summary decision.

5.0 ISSUES

5.1 Four (4) issues have been formulated for resolution by the Tribunal as follows;-

- a) *Whether the Authority erred in law and fact to hold that Arua Municipal Council adhered to the revised policy guidelines on the Management and Levying of Parking Fees in Local Government Public Service Vehicle Areas dated 13th February 2017 and whether the Entity was right to eliminate the Applicant on the ground of experience despite the fact that selective bidding method was used?*
- b) *Whether the Authority erred in law and fact to hold that the administrative review decision of the Entity was received by the Applicant at the time an application was lodged before the Authority?*
- c) *Whether the Authority erred in law and fact to hold that the BEB continues to manage the taxi park despite the fact that there is process of administrative review going on?*
- d) *What remedies are available to the parties?*

6.0 SUBMISSIONS BY PARTIES

6.1 Counsel for the Applicant submitted in respect of the first and second issue collectively that the Authority erred when it upheld that the entity adhered to the use of selective bidding method in accordance with the Revised Policy Guidelines on the Management and levying of parking fees in Local Governments' Public Service Vehicle Parking Areas when the policy clearly states at page 6 Part 5 (iv) that each Local Government shall not levy more than UGX 80,000 per vehicle for each calendar month. He submitted that the Guidelines are mandatory and therefore cannot be ignored by the Authority or the Entity simply because the guidelines would affect service delivery in the Municipality.

6.2 Counsel for the Applicant submitted that the Authority failed to exercise its cardinal role enshrined in Section 7 (d) of the PPDA Act, 2003 to prepare, update and issue authorized versions of standardised bidding documents,

procedural forms and any other attendant documents to procuring and disposing entities. He argued that it was the duty of the Authority to issue a revised version of the standard bidding document for parks to suit the revised policy guidelines since the Executive Director of the Authority received copy of the Guidelines.

- 6.3 Counsel for the Applicant submitted that it was wrong for the Entity to state that the Best Evaluated Bidder (BEB) was retained because of experience. As a matter of fact, the BEB had applied twice in FY 2015/16 and 2016/2017. During this period, experience was not a requirement. Regulation 38 (5) of the Local Governments (PPDA) Regulations, 2006/SI No. 39 of 2006 provides that the following considerations shall be taken into account in developing a shortlist-
- a) A fair and equal opportunity shall be provided to all providers;
 - b) There shall be a rotation of different providers on successive shortlists;
 - c) A bidder shall not be included unless he or she is expected to satisfy fully the eligibility requirements;
 - d) A bidder shall not be included unless he or she is expected to satisfy fully the qualification requirements of competence, capacity, resources and experience required for the execution of the bid in question. Counsel submitted that emphasis is on sub-sections 5 (c) & (d). He argued that eliminating the firm on the ground of experience will mean that the BEB shall continue to manage the taxi park for the entire period of the reservation scheme which will be against the spirit of the Policy Guidelines and contrary to Regulation 38 (5) of the Local Governments (PPDA) Regulations 2006/SI No. 39 of 2006 that states that there shall be rotation of different providers on successive shortlists. He further submitted that the Policy Guidelines that created the reservation scheme in 2013 have not been changed totally but revised and that in this regard, the BEB does not qualify to manage the taxi park since it has already managed it for two financial years under the reservation scheme.
- 6.4 Counsel for the Applicant submitted that the Applicant sought for redress under Section 90 (3) (a) of the PPDA Act, 2003 and applied to the Authority when the Accounting Officer failed to issue a decision within the statutory time of 15 working days and that was one of the Applicant's ground before the Authority which the Authority has totally failed to address but instead

has introduced a different ground on its own to favour the Entity. He submitted that the Tribunal should take a tougher action against the Entity for continuously violating the Act.

- 6.5 Counsel for the Applicant also relied on the case of **Arua Kubala Vs Public Procurement and Disposal of Public Assets Authority, Application No. 9 of 2006** where the Tribunal decided that; *'An Accounting Officer acts contrary to the law when he refuses to deliver a decision and allows the procurement process to continue.* Counsel submitted that the Tribunal should therefore find that the Accounting Officer acted contrary to the law when he refused or neglected to make a decision within the stipulated statutory time.
- 6.6 Counsel for the Applicant in respect to the third issue submitted that the BEB continued to operate despite on-going administrative review process. That the Entity in the first instance refused to hear the administrative review and kept the BEB manning the park under the expired contract.
- 6.7 Counsel further submitted that this Tribunal finds merit in this application and allows the prayers as sought in the pleadings.
- 6.8 Counsel for the 1st Respondent (Authority) submitted that paragraph 4 (1) of the Policy Guidelines on the Management and Levying of Parking Fees in Local Government Public Service Vehicle Areas dated 13th February 2017 provides that the selective bidding method shall be used where more than one Co-operative Society operate in the taxi park. The 1st Respondent found that Entity used selective bidding method and invited the two Co-operative Societies in the Municipality i.e Arua United Transporters Co-operative Savings and Credit Society Limited and Arua Taxi Operators Co-operative Savings and Credit Society Limited in accordance with the Policy Guideline.
- 6.9 Counsel for the 1st Respondent submitted that the Revised Policy Guidelines on the Management and Levying of Parking Fees in Local Government Public Service Vehicle Areas dated 13th February 2017 is not applicable to the rotation system because the Guidelines came into force in February 2017. The Guidelines cannot apply retrospectively. He argued that in this case the BEB had participated in procurement process before

the Guidelines and therefore, Regulation 38 (5) (b) and (d) of the Local Governments (PPDA) Regulations 2006 / SI No. 39 of 2006, would bar the Entity from disqualifying the applicant.

- 6.10 Counsel for the 1st Respondent submitted that it should be appreciated that selective bidding has several levels to consider. Taxi parks are special in nature because of their exclusive nature as provided for in the Guidelines. He added that most times the Regulations must be read together with the Government policy.
- 6.11 Counsel for the 1st Respondent submitted that the Authority found that the bidding document required bidders to submit bid prices and it did not specifically provide for the percentage commission which is prescribed by the Policy Guideline. He argued that the Applicant did not raise this issue with the Entity during the bidding process and also submitted a bid with UGX 18,875,500. Counsel submitted that the Entity adhered to the use of the selective bidding method in accordance with the Revised Policy Guidelines on the Management and Levying of Parking Fees in Local Governments' Public Service Vehicles Parking Areas.
- 6.12 Counsel for the 1st Respondent submitted that the evaluation criteria under the bidding document required experience in similar works. That the Authority reviewed the bid of the Applicant and found it did not provide evidence of experience in managing taxi parks and was therefore correctly evaluated as non-responsive to the requirement by the Entity.
- 6.13 Counsel for the 1st Respondent submitted that in the application made to the Authority, the Applicant did not raise the issue of the issuance of a revised version of the standard bidding documents by the Authority which has been raised in this application and therefore it cannot be raised in this application before the Tribunal. Counsel submitted that on the basis of the above facts, it is asserted that this issue should be answered in the affirmative.
- 6.14 Counsel for the 1st Respondent in respect to the second issue submitted that Section 90 (2) (b) of the PPDA Act, 2003 provides that on receiving a complaint, the Accounting Officer shall make a decision within 15 working

days indicating the corrective measures to be taken, if any, and giving reasons for his or her decisions and submit a copy of the decision to the Authority. Counsel submitted that the Applicant applied for administrative review before the Accounting Officer on 15th June 2017 and the 15 working days elapsed on 5th July 2017 and that the Accounting Officer's decision dated 10th July 2017 was therefore issued out of time.

- 6.15 Counsel for the 1st Respondent submitted that the Authority found that the Applicant sought redress under Section 90 (3) (a) of the PPDA Act and applied to the Authority when the Accounting Officer failed to issue a decision in time. Counsel submitted that there is no merit in this issue since the Applicant utilized the remedy provided for under the law.
- 6.16 Counsel for the 1st Respondent submitted in respect to the third issue that the allegations contained in the application regarding the issue are not in respect to the impugned procurement process and therefore they should not be raised in this application.
- 6.17 Counsel for the 1st Respondent submitted that the Authority takes exception to the allegation that it was unfair and biased in its conduct of the administrative review process and asserts that the Applicant was afforded a fair hearing. Counsel submitted that on the basis that the allegations contained in this application under this issue are not relevant to the impugned procurement process and were not in issue in the application before the 1st Respondent, this issue should be answered in the negative.
- 6.18 Counsel for the 1st Respondent asserted that this application lacks merit, is untenable and it should be dismissed with costs.

7.0 **RESOLUTION BY THE TRIBUNAL**

The instant application raises four issues which the Tribunal will resolve in the same order as raised by the Parties.

- 7.1 The Tribunal carefully studied the Application, the responses to the Application and the written submissions. It also carefully listened to the oral arguments made by the parties at the hearing. In resolving this Application the Tribunal will deal with the issues in the same order as presented by the parties.

Issue 1: Whether the Authority erred in law and fact to hold that Arua Municipal Council adhered to the revised policy guidelines on the management and levying of parking fees in local government public service vehicle areas dated 13th February 2017 and whether the Entity was right to eliminate the Applicant on the ground of experience despite the fact that selective bidding method was used?

- 7.3. In order to determine this issue, the Tribunal has to examine the wording of the relevant provisions of the PPDA laws. For ease of reference, they are reproduced below:

Regulation 38 (5) of the Local Governments (PPDA) Regulations, 2006/SI No. 39 of 2006 *provides that the following considerations shall be taken into account in developing a shortlist-*

- a. A fair and equal opportunity shall be provided to all providers;*
- b. There shall be a rotation of different providers on successive shortlists;*
- c. A bidder shall not be included unless he or she is expected to satisfy fully the eligibility requirements;*
- d. A bidder shall not be included unless he or she is expected to satisfy fully the qualification requirements of competence, capacity, resources and experience required for the execution of the bid in question.*

Guideline 4 of the Revised Policy Guidelines on the Management and Levying of Parking Fees in Local Governments' Public Service Vehicle Parking Areas dated 13th February 2017, *provides that the procurement process for the Management services for the parks in Local Governments shall be reserved for Park Operators in accordance with the PPDA Act's Reservation Scheme for a period not exceeding two years. All processes and stages of procurement must be adhered to as stipulated in the relevant regulation.*

Guideline 5 (vi) of the Revised Policy Guidelines on the Management and Levying of Parking Fees in Local Governments' Public Service Vehicle Parking Areas dated 13th February 2017, *provides each local government shall not levy more than UGX 80,000 per vehicle for each calendar month. This rate may be reviewed and revised by the Minister in consultation with key stakeholders every Financial Year.*

- 7.4 Counsel for the Applicant submitted that the Authority erred when it upheld that the entity adhered to the use of selective bidding method in accordance with the Revised Policy Guidelines on the management and levying of parking fees in Local governments' public service vehicle parking areas when the policy clearly states in page 6 part 5 (iv) that each Local Government shall not levy more than UGX 80,000 per vehicle for each calendar month.
- 7.5 The Revised Policy Guidelines on the Management and Levying of Parking Fees in Local Governments' Public Service Vehicle Parking Areas dated 13th February 2017 regarding the levying of parking fees is crystal clear that a Local Government shall not levy more than UGX 80,000 per vehicle in a calendar month. The Guidelines further provide for the review of the fees by the Minister in consultation with the stakeholders every financial year.
- 7.6 The Guidelines came into force on 1st March 2017 and revision can only be done at the end of the financial year. The 1st Respondent in its response dated 30th August 2017 at paragraph 4 of page 2 states that *'The 1st Respondent found that the bidding document required bidders to submit bid prices and it did not specifically provide for the percentage commission which is prescribed by the Policy Guideline.'*
- 7.7 Guideline 5 (vii) of the Revised Policy Guidelines on the Management and Levying of Parking Fees in Local Governments' Public Service Vehicle Parking Areas dated 13th February 2017, provides that *'The procured or contracted Cooperative Society shall be paid by the Local Government or Urban Authority on a monthly basis for services rendered as stipulated in the Management Contract or Memorandum of understanding. The payment will be based on proceeds of the previous month's actual collections of not more than 25% of the total amount collected.'*

- 7.8 The Tribunal finds that the admission by the 1st Respondent that the bidding document required bidders to submit bid prices and it did not specifically provide for the percentage commission which is prescribed by the Policy Guidelines constitutes non-compliance of the Guidelines by the Entity. The Tribunal takes note of the preamble of the Guideline which states that '*the Policy Guidelines had restored orderliness and calmness in the management of Parks across the Country*'. The Tribunal observes that the said Guideline cannot be made in vain and for it to achieve its purposes, Entities must adhere to it.
- 7.9 Counsel for the Applicant submitted that the Authority failed to exercise its cardinal role enshrined in Section 7 (d) of the PPDA Act, 2003 to prepare, update and issue authorized versions of standardised bidding documents, procedural forms and any other attendant documents to procuring and disposing entities. The Tribunal finds that the 1st Respondent did not abdicate its duties as provided for under the PPDA Act, 2003 because the bid document exhibited by the 2nd Respondent (Entity) to the Tribunal clearly indicates that it was prepared for parks by the Authority.
- 7.10 Counsel for the Applicant submitted that it was wrong for the Entity to say that the Best Evaluated Bidder (BEB) was retained because of experience whereas Counsel for the 1st Respondent submitted that the Revised Policy Guidelines on the management and levying of parking fees in local government public service vehicle areas dated 13th February 2017 is not applicable to the rotation system because the Guidelines came into in February 2017.
- 7.11 The overriding principle here is that of '*a fair and equal opportunity and rotation*' as contained in Section 38 (5) of the Local Governments (PPDA) Regulations, 2006/SI No. 39 of 2006. The import of this provision is to provide fair and equal opportunity and rotation to all the bidders who participate in in the reservation scheme.
- 7.12 The Regulation is very clear on how one gets on to the shortlist. In the instant case before the Tribunal, the Applicant had already passed the requirement of experience because he was invited for the bid after

satisfying the provisions of Regulation 38 (5) of the of the Local Governments (PPDA) Regulations, 2006/SI No. 39 of 2006. It was therefore not necessary for the Entity to evaluate the bidders based on experience even when it was not necessary at that stage.

- 7.13 Requiring a bidder to have experience is against the principle of competition provided for in the reservation scheme. This is so because at the beginning of the reservation scheme, all the bidders have equal chance to participate in the procurement process without considering experience whereas in the following Financial Year the Entity requires experience for bidders to qualify. This is unfair; it will lock out the rest of the bidders who had never got the opportunity to manage parks. In the Tribunal's view, the requirement of experience will favour the outgoing provider and therefore creates a situation where monopoly could thrive and is totally against the principles of competition as provided for under Section 46 of the PPDA Act, 2003.
- 7.14 The Rotation policy under the Revised Policy Guidelines on the Management and Levying of Parking Fees in Local Government Public Service Vehicle Areas dated 13th February 2017 is to encourage all the registered bidders to participate under the reservation scheme. The Applicant submitted that as a matter of fact, the BEB was a provider twice in FY 2015/16 and 2016/2017.
- 7.15 The Guideline (4) (i) of the Revised Policy Guidelines on the Management and Levying of Parking Fees in Local Government Public Service Vehicle areas dated 13th February 2017 provides that the procurement process for the management services for the parks in local governments shall be reserved for park operators in accordance with the PPDA Act's Reservation Scheme for a period not exceeding two years. The Park Operator in this case is the BEB who has managed the park for the FY 2015/16 and 2016/17. The two years provided by the Guideline was exhausted by the BEB and cannot therefore benefit out if it for the third year.
- 7.16 The Tribunal disagrees with the submission by Counsel for the 1st Respondent that the Revised Policy Guidelines on the Management and Levying of Parking Fees in Local Government Public Service Vehicle Areas

dated 13th February 2017 is not applicable to the rotation system because the Guidelines came into force in February 2017. Looking at the preamble of the Guideline, it states that *'July 2013, the Ministry issued a three year policy guideline on management and development of taxi parks in local governments which expired on June 2016.* The current Revised Policy Guidelines on the management and levying of parking fees in local government public service vehicle areas dated 13th February 2017 is an amendment to the first Guideline which was issued in July 2013 and cannot therefore be taken as if it was the first Guideline under the reservation scheme. It is therefore wrong for the Counsel for the 1st Respondent to assert that the Guideline only came into force on 1st March 2017.

- 7.17 The Tribunal finds that the Ministry issued the first Guideline on the management and levying of parking fees in local government public service vehicle areas in July 2013. The time of computing years for purposes of fulfilling the requirements of the Guideline began running from the Financial Year 2013 and given this circumstance, the BEB has fully exhausted the two years he is eligible provided by the Guideline for the management of the park since it started managing the park from the Financial Year 2015/16 and 2016/2017 which the 1st Respondent does not also contest.
- 7.18 In conclusion on this issue, the Tribunal faults the decision of the 1st Respondent that the Entity adhered to the revised policy guidelines on the management and levying of parking fees in local government public service vehicle areas dated 13th February 2017. The Tribunal further faults the decision of the 1st Respondent to eliminate the Applicant on the ground of experience despite the fact that selective bidding method was used.
- 7.19 Following from the above analysis, the Tribunal finds that the Entity did not adhere to the revised policy guidelines on the management and levying of parking fees in local government public service vehicle areas dated 13th February 2017 and it was wrong for the Entity to eliminate the Applicant on the ground of experience despite the fact that selective bidding method was used.

- 7.20 ***2nd Issue: Whether the Authority erred in law and fact to hold that the administrative review decision of the Entity was received by the Applicant at the time an application was lodged before the Authority?***
- 7.21 Counsel for the Applicant submitted that the Applicant sought for redress under Section 90 (3) (a) of the PPDA Act, 2003 and applied to the Authority when the Accounting Officer failed to issue decision within the statutory time of 15 working days and this position was confirmed by the Counsel for the 1st Respondent when he submitted that the Authority found that the Applicant sought redress under Section 90 (3) (a) of the PPDA Act and applied to the Authority when the Accounting Officer failed to issue a decision in time.
- 7.22 The provision of the PPDA Act 2003 for the Accounting Officer to issue decision within 15 working days was designed for a purpose to provide efficiency in the procurement process and cannot therefore be taken for granted by an Accounting Officer in the administrative review process. The Accounting Officer is under the law required to issue decision within 15 working days.
- 7.23 The Tribunal faults the decision of the 1st Respondent to assert that the Applicant sought redress under Section 90 (3) (a) of the PPDA Act, 2003. The Tribunal further faults the Accounting Officer for failing to issue its decision within the statutory period of 15 working days.
- 7.24 In concluding this issue, the Tribunal relied on the case of **Arua Kubala Vs Public Procurement and Disposal of Public Assets Authority, Application No. 9 of 2006** where the Tribunal decided that; *'An Accounting Officer acts contrary to the law when he refuses to deliver a decision and allows the procurement process to continue.* The Tribunal accordingly finds that failure to issue decision by the Accounting Officer within 15 working days is contrary to the provisions of the law
- 7.25 ***3rd Issue: Whether the Authority erred in law and fact to hold that the BEB continues to manage the taxi park despite the fact that there is process of administrative review going on?***

7.26 Counsel for the Applicant in respect to the third issue submitted that the BEB continued to operate despite the administrative review process ongoing. That the Entity first of all refused to hear the administrative review and kept the BEB manning the park under the expired contract. The Deputy Town Clerk, Arua Municipal Council informed the Tribunal that the revenue officer of the Division where the park is located was asked to collect revenue and that the best evaluated bidder was not in charge. He also admitted that the Entity did not formally recruit people to collect revenue but only picked competent people to collect revenue under their supervision and issued them with their tags. The Deputy Town Clerk also admitted that they could have taken management as Municipal instead of using a few individuals from the Best Evaluated Bidder without formally informing the public.

7.27 The Tribunal faults the Entity for using few individuals from the Best Evaluated Bidder to continue to collect revenue on behalf of the Municipal Council during the administrative review period aware of the conflict it was causing among the bidders. The unilateral decision by the Accounting Officer of the Municipal Council to hand pick few individuals from the Best Evaluated Bidder was illegal. If there is an urgent need to collect revenue on behalf of the Municipal Council, they should have hired temporary employees in accordance with the Public Service Standing Order. The Tribunal further faults the decision of the Authority to hold that the BEB did not continue to manage the taxi park during the administrative review period.

7.28 In conclusion, the Tribunal finds that Authority erred in law and fact to hold that the BEB did not continue to manage the taxi park during the administrative review process.

8.0 **4th Issue: Remedies.** (See below 9.0).

9.0 **DECISION OF THE TRIBUNAL**

1. The Application is allowed and the decision of the Authority is set aside.

2. The impugned procurement process be re-evaluated in accordance with Uganda Government Revised Policy Guidelines on the Management and Levying of Parking Fees in Local Government Public Service Vehicle Areas dated 13th February 2017.
3. The interim arrangement by Arua Municipal Council for collection of revenue in Arua Taxi Park is irregular and inconsistent with the Uganda Government Public Service Standing Orders and should be disbanded with immediate effect.
4. The administrative review fees paid by the Applicant at the Entity level be refunded to the Applicant.
5. The taxed reasonable costs incurred by the Applicant be borne by the 2nd Respondent.

Dated, signed and sealed by the Tribunal thisday of 2017.

SIGNED by OLIVE ZAALE OTETE] CHAIRPERSON
SIGNED by MOSES JURUA ADRIKO] MEMBER
SIGNED by DAVID KABATERAINE] MEMBER
SIGNED by ABRAHAM NKATA] MEMBER
SIGNED by ARCHT JOEL KATEREGGA] MEMBER