

**PROPOSED ACDBE OVERALL CONCESSION GOALS**  
**Federal Fiscal Years 2019 - 2021**  
**Boise Airport**  
**Boise, ID**

Airport Sponsor: City of Boise

Airport: Boise Airport

Goal Period: From: October 1, 2018  
Thru: September 30, 2021

ACDBE Goal for Non-Car Rental Concessions: 2.7% (Race Neutral)

ACDBE Goal for Car Rental Concessions: 0.7% (Race Neutral)

**Section 23.45: Separate Overall Goal Calculation for Concessions**

**Other Than Car Rentals**

**Amount of Goal**

Boise Airport's (the "Airport") overall goal for concessions other than car rental during the period beginning October 1, 2018 and ending September 30, 2021 is 2.7%. The goal is expressed as a percentage of the total estimated gross receipts for concessions at Boise Airport.

The following are not included in the total gross receipts for concessions: (a) the gross receipts of car rental operations, (b) the dollar amount of a management contract or subcontract with a non-ACDBE, (c) the gross receipts of business activities to which a management contract or subcontract with a non-ACDBE pertains, and (d) any portion of a firm's estimated gross receipts that will not be generated from a concession.

The Airport determines the market area for each concession opportunity as it arises. The market area is defined as the geographical area in which the substantial majority of firms which seek to do the specific concessions business with the airport are located and the geographical area in which the firms receive a substantial majority of concessions related revenues are located.

The calculation for determining the overall goal for the three-year period is as follows:

**Federal Fiscal Years 2019 – 2021**

Total estimated gross receipts for all concessions excluding car rentals = \$79,778,045

Estimated ACDBE gross receipts = \$2,139,530

$\$79,778,045 / \$2,139,530 = 2.7\%$

**Methodology used to Calculate Overall Goal**

Overall goals have been determined by consolidating the total estimated gross revenues and estimated ACDBE gross revenues for continuing and anticipated new concession agreements that will become effective during the goal period. Goals for each new concession are determined through an analysis of the opportunity, potential for ACDBE participation and the relative availability of ACDBE firms who are ready, willing and able to perform under the agreement.

In accordance with 49 CFR part 23.51(c) ACDBE goals for specific opportunities are determined as follows:

Step 1: 23.51(c)

The Airport determines the base figure for the relative availability of ACDBEs for the specific

opportunity. The base figure may be calculated in a number of ways, depending upon what is most appropriate for the specific opportunity.

Examples are as follows:

Option 1: Ready, willing, and able ACDBEs in the appropriate trade in the determined market area ÷ All ready, willing and able companies in the appropriate trade in the determined market area.

The data source or demonstrable evidence used to derive the numerator may be either the DBE/ACDBE directory (23.51(c)(1)) or an active participant list (23.51(c)(2)).

If the Airport uses ACDBE directories, which directories and which NAICS codes were used will be identified. The Airport may also augment available ACDBEs with firms in local MBE/WBE directories or trade association lists. If the Airport uses these sources to augment the numerator, the sources used and the number of firms added to the numerator will be identified.

If the Airport uses an Active Participant List, where the information was obtained will be identified. Such information may come from past experience with firms that have run concessions or sought concession contracts or leases, knowledge about the universe of firms in certain concession services that tend to be interested in participating, and attendance lists from informational and outreach meetings about upcoming concession opportunities.

Option 2: Disparity Study -There are no relevant disparity studies from the Airport's geographic area at this time. In the future, the Airport may elect to utilize a disparity study should one become available.

Option 3: Goal of another sponsor – The Airport may use the goal of another airport or DOT sponsor in the same, or substantially similar market if their overall goal is in compliance with 49 CFR parts 23. Should the Airport elect to do so, the Airport will include information as to why our airport concession opportunity has the same or substantially similar market.

Option 4: Alternative Methods – The Airport may elect to use other methods to determine the base figure, however it must be based on demonstrable evidence of local market conditions and be designed to arrive at a goal that is rationally related to the relative availability of ACDBEs in the market area.

#### Step 2: 23.51(d)

After calculating a base figure of the relative availability of ACDBEs, the Airport will examine evidence to determine what adjustment, if any, is needed to the base figure in order to arrive at the overall goal.

In accordance with 23.51(d), any adjustment will be designed to reflect as accurately as possible the ACDBE participation the Airport would expect in the absence of discrimination. In

addition, the Airport will document the basis on which the base figure was adjusted using the specific data.

### **Boise Airport Non-Car Rental Concessions**

Boise Airport ACDBE Goals for federal fiscal years 2019 – 2021 have been set for each concession contract as listed below and shown on the following chart. It should be noted that approximately 91% of the non-car rental concession revenue is generated by two concessions, food/beverage and news/gift/specialty retail operations. ACDBE goals have been set for both of these operations. All other non-car rental concessions combined generate less than 9% of the total revenue.

**Food/Beverage** - The food/beverage contract is operated by DNCTHS Boise Partners and expires in 2024. The contract currently contains an ACDBE goal of 4.0%. The goal is to be achieved through a joint venture arrangement in which the ACDBE participates at a level of 4% of the gross revenues. There is currently no ACDBE participant, however we continue to work with the operator to meet the ACDBE participation goal. The goal for this concession will remain at 4.0% throughout this goal period.

**News/Gift** - The News/Gift/Specialty Retail contract operated by Paradies-Taters II is under a 95%/5% joint venture agreement. The contract does not expire until 2024. A goal of 5% was set for the contract and will continue throughout this three-year goal period.

**Advertising** - The advertising contract was operated by an ACDBE firm until January 2015 when it was sold to Lamar Advertising. The contract will expire on August 31, 2020. A goal analysis will be conducted prior to the contract's expiration; however, it is unlikely that ACDBE gross receipts participation will be viable based the size of the contract and the margins generated for this type of contract. For purposes of this three-year goal, we will assume that the agreement will remain without a goal for the three-year period.

The following concessions each generated less than \$150,000 in gross revenues in FFY 2017. Given the small size of each of these concessions, each represents a significant opportunity to obtain race-neutral participation as small businesses may be competitive for these opportunities and, in fact, do participate directly in some of these smaller opportunities.

**Specialty Retail 1** - This contract is currently operated by Forever Heather, a women's clothing and accessories store. The contract will expire on 9/30/2019. The concessionaire operating this location is currently an ACDBE. This contract is for a single unit and therefore has no subcontracting opportunities. In addition, the concession generates less than \$200,000 annually. We do not anticipate setting an ACDBE goal for this opportunity during this goal period, however we will count the participation achieved for this concession at 100% for FFY 2019.

**Specialty Retail 2** – This contract is currently operated by Art Source Gallery and operates as an Art Gallery/Specialty Retail location. The contract is operated on a month-to-month basis and generates less than \$40,000 in gross revenues annually. Due to the size of the concession, we do not anticipate setting a goal for this concession during this three-year goal period. In addition, this concession may be eliminated during this goal period.

**Arcade/Massage Chairs/ATM** – This concession is operated by Ellis Amusements and generated approximately \$105,000 in 2017 and less than \$100,000 in FFYs 2015 and 2016. The contract expires on 9/30/19. Given the size of this opportunity, we do not anticipate setting a goal for this concession during this three-year goal-period.

**Shoe Shine Services** – H&W Services is the concessionaire for the shoe shine services, and is, itself an ACDBE. However, the services are provided by others who are not ACDBE under an agreement with H&W Services and are therefore not being counted. The contract is currently operating on a month-to-month agreement. The concession generates less than \$35,000 annually and therefore a goal will not be set for this three-year period.

**Luggage Carts** – Smarte Cart operates the luggage cart contract at the Airport. The Agreement is currently operated under a month-to-month holdover. The concession generates less than \$50,000 annually in gross revenues. While there is not a purchase goal, the operator does utilize an ACDBE service provider for the contract. The use of this provider represents approximately \$9,000 in services purchased annually or approximately 56% of total purchases. Given the size and nature of the opportunity, there will continue to be no ACDBE goal for this contract throughout the three-year goal period.

**ATM Machines** - The ATM machine contract is operated by US Bank on a month-to-month Agreement. The contract has no ACDBE goal, as there are no ACDBE ATM concession operators or ACDBE financial institutions in the Idaho UCP Directory. In addition, the concession generates less than \$30,000 in gross revenues annually.

**Gas Station** - Airport Chevron is located on airport property and is operated under an Agreement that will expire in 2024. There is currently no ACDBE goal in the Agreement. The concession will be evaluated for a goal prior to re-solicitation or extension.

**Hotels** - Commodore Motor Hotel dba Best Western Vista Inn, NB & J dba Rodeway Inn, and Best Western Airport Inn – These hotels are located on airport property; however, they operate under a 60-year lease that does not expire until 12/31/41. Therefore, these operations do not have an ACDBE goal and are likely to continue without a goal until expiration as there is no opportunity for subleasing in these operations.

### **Other Potential Concessions**

The following operations were originally leased as land leases and therefore are not classified as concessions:

Kopper Kitchen Restaurant – The restaurant serves the general public and not exclusively the traveling public. It is located on airport property, but outside of the terminal. The agreement expires in 2024.

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<b>City of Boise Boise AIRPORT ACDBE CONCESSION LEASING GOALS Goal Period: October 1, 2018 - September 30, 2021 FFYs 2019, 2020, and 2021</b>				
<b>Concessionaire</b>	<b>Contract</b>	<b>*Projected Three-Year Gross Revenues</b>	<b>ACDBE Gross Revenues Based on Goal</b>	<b>ACDBE Goal</b>
DNCTHS Boise Partners Inc.	Food / Beverage	\$24,506,558	\$980,262	4.0%
Paradies-Taters II	Gift & News/Sp Retail	\$17,810,110	\$890,506	5.0%
Forever Heather	Specialty Retail	\$458,554		
Art Source Gallery	Art Gallery/Specialty Retail	\$107,572		
Lamar Transit	Advertising	\$2,769,131		
Ellis Amusements	Arcade/Massage Chairs/ATM	\$334,488		
H & W Services	Shoe Shine Service	\$108,982		
Smarte Carte-Carts	Luggage Carts	\$138,360		
US Bank ATM	ATM	\$86,123		
Chevron	Gas Station	\$8,296,815		
Commodore Motor Hotel dba Best Western Vista Inn	Hotel	\$7,857,761		
NB & J dba Rodeway Inn	Hotel	\$3,481,977		
Sidhu & Jassal dba Best Western Airport Inn	Hotel	\$3,800,101		
<b>Total Concessions (Excluding Rental Cars)</b>		<b>\$69,756,534</b>	<b>\$1,870,768</b>	<b>2.7%</b>

\*Assumes 3.0% growth annually

Given the above, we propose the base ACDBE goal for FFYs 2019, 2020, and 2021 at 2.7%.

## **Step 2 – Adjustments**

The ACDBE regulation (49 CFR part 23) provides for a Step 2 adjustment of the developed base goal for a variety of factors, including the current capacity of ACDBEs to perform work in the concession program, as measured by the volume of work ACDBEs have performed in recent years. ACDBE achievement for the most recent three-year period is as follows:

Actual Past History of ACDBE Participation			
YEAR	TOTAL GROSS REVENUES	ACDBE GROSS REVENUES	ACDBE %
2017	\$22,420,727	\$467,942	2.09%
2016	\$20,226,563	\$458,461	2.27%
2015	\$18,508,446	\$447,449	2.42%

While the past history data might suggest a downward adjustment to the goal, we have elected not to adjust the goal as the shortfall in each of the years does not appear to have been caused by a capacity issue.

The Idaho Transportation Department published a Disparity Study in 2017. That study listed considerations for an upward adjustment to the goal as follows:

- Barriers that minorities and women face in human capital and owning businesses in the local contracting industry. Such an adjustment would correspond to a “determination of the level of DBE participation you would expect absent the effects of discrimination.” Evidence of barriers that affect minorities, women, and minority- and woman-owned businesses in obtaining financing, bonding, and insurance, and evidence that certain groups of minority- and woman-owned businesses are less successful than comparable businesses owned by non-Hispanic white men also supports an upward adjustment.

The above will be considered when current contracts expire and a new goal analysis is warranted. There is no other relevant data to support an adjustment to the base goal. Therefore, the proposed overall ACDBE goal for the three-year period commencing October 1, 2018 and ending September 30, 2021 is 2.7%.

## **Breakout of Estimated Race-Neutral & Race Conscious Participation**

ACDBE contract goals reflected in this document were originally set as race-neutral goals. The contracts containing goals will not expire during this three-year period, therefore the goals will remain race-conscious throughout this goal period. The Airport will continue to use race-neutral methods to encourage further participation throughout the goal period, including the following:



1. Locating and identifying ACDBEs and other small businesses who may be interested in participating as concessionaires under 49 CFR Part 23;
2. Notifying ACDBEs of concession opportunities and encouraging them to compete, when appropriate;
3. When practical, structuring concession activities so as to encourage and facilitate the participation of ACDBEs;
4. Providing technical assistance to ACDBEs in overcoming limitations, such as inability to obtain bonding or financing;
5. Ensuring that competitors for concession opportunities are informed during pre-solicitation meetings about how the sponsor's ACDBE program will affect the procurement process;
6. Providing information concerning the availability of ACDBE firms to competitors to assist them in obtaining ACDBE participation; and
7. Establishing a business development program (see 49 CFR Part 26.35); technical assistance program or taking other steps to foster ACDBE participation in concessions.

### **Consultation with Stakeholders**

In accordance with 49 CFR part 23, §23.43, the airport has sent emails and followed up with phone calls to the following stakeholders regarding this three-year goal:

[Add List]

The results of the consultations are as follows: TBD

**Overall Goal Calculation for Car Rentals (23.45)**  
**FFY 2019-2021**

**Background**

Boise Airport currently has eight (8) different on-airport car rental operations owned by four (4) different companies. The current agreements will expire on September 30, 2021; however, the airport has developed an ACDBE car rental goal for the entire three-year goal period at this time based on the purchase of goods/services. Current car rental concession revenues are in excess of \$47 million annually.

In accordance with the regulation regarding ACDBE participation in Airport Concessions, we have conducted research to determine an appropriate ACDBE goal for car rental concessions at the Airport. The methodology for setting the goals is included in this report.

49 CFR Part 23 provides the following guidance for establishing concession goals:

*§ 23.51(a) Your objective in setting a goal is to estimate the percentage of the base calculated under §§23.47–23.49 that would be performed by ACDBEs in the absence of discrimination and its effects.*

*(1) This percentage is the estimated ACDBE participation that would occur if there were a “level playing field” for firms to work as concessionaires for your airport.*

*(2) In conducting this goal setting process, you are determining the extent, if any, to which the firms in your market area have suffered discrimination or its effects in connection with concession opportunities or related business opportunities.*

*(3) You must complete the goal-setting process separately for each of the two overall goals identified in §23.41 of this part.*

*(b) (1) Each overall concessions goal must be based on demonstrable evidence of the availability of ready, willing and able ACDBEs relative to all businesses ready, willing and able to participate in your ACDBE program (hereafter, the “relative availability of ACDBEs”).*

*(2) You cannot simply rely on the 10 percent national aspirational goal, your previous overall goal, or past ACDBE participation rates in your program without reference to the relative availability of ACDBEs in your market.*

*(3) Your market area is defined by the geographical area in which the substantial majority of firms which seek to do concessions business with the airport are located and the geographical area in which the firms which receive the substantial majority of concessions-related revenues are located. Your market area may be different for different types of concessions.*

**Counting Participation in Car Rentals**

Given the fact that there are few ACDBE car rental firms operating in airports, we have elected to base the Car Rental ACDBE goal on the purchase of goods and services from ACDBE or potential/ACDBE firms. The regulation provides for counting ACDBE participation for car rentals as follows:

**§ 23.53 How do car rental companies count ACDBE participation toward their goals?**

(a) As a car rental company, you may, in meeting the goal the airport has set for you, include purchases or leases of vehicles from any vendor that is a certified ACDBE.

(b) As a car rental company, if you choose to meet the goal the airport has set for you by including purchases or leases of vehicles from an ACDBE vendor, you must also submit to the recipient documentation of the good faith efforts you have made to obtain ACDBE participation from other ACDBE providers of goods and services.

(c) While this part does not require you to obtain ACDBE participation through direct ownership arrangements, you may count such participation toward the goal the airport has set for you.

(d) The following special rules apply to counting participation related to car rental operations:

(1) Count the entire amount of the cost charged by an ACDBE for repairing vehicles, provided that it is reasonable and not excessive as compared with fees customarily allowed for similar services.

(2) Count the entire amount of the fee or commission charged by an ACDBE to manage a car rental concession under an agreement with the concessionaire toward ACDBE goals, provided that it is reasonable and not excessive as compared with fees customarily allowed for similar services.

(3) Do not count any portion of a fee paid by a manufacturer to a car dealership for reimbursement of work performed under the manufacturer's warranty.

(e) For other goods and services, count participation toward ACDBE goals as provided in part 26, §26.55 and §23.55 of this part. In the event of any conflict between these two sections, §23.55 controls.

(f) If you have a national or regional contract, count a pro-rated share of the amount of that contract toward the goals of each airport covered by the contract. Use the proportion of your applicable gross receipts as the basis for making this pro-rated assignment of ACDBE participation.

*Example to paragraph (f):* Car Rental Company X signs a regional contract with an ACDBE car dealer to supply cars to all five airports in a state. The five airports each account for 20 percent of X's gross receipts in the state. Twenty percent of the value of the cars purchased through the ACDBE car dealer would count toward the goal of each airport.

**Market Area**

The Car Rental Concessions at the Airport are currently operated by four (4) different companies. Based on the types of goods/services purchased by the firms (e.g. auto repair, insurance, fuel, etc.), we have decided to use the market area for the purchase of goods and services, with the exception of vehicle purchases, as the State of Idaho. Clearly, there are some items that are purchased either regionally or nationally, however car rental firms have stated that they cannot provide this information at this time. The geographic region for the

purchase of vehicles varies depending on the operator with some purchasing from dealerships within the state and others from various areas of the country, including from manufacturers. We will, therefore, use a national geographic region for vehicle purchases.

### **Goal-Setting Step I**

The regulation provides the following examples of potential approaches for accomplishing Step 1, determining the base figure, as follows:

*23.51(c) Step 1. You must begin your goal setting process by determining a base figure for the relative availability of ACDBEs. The following are examples of approaches that you may take toward determining a base figure. These examples are provided as a starting point for your goal setting process. Any percentage figure derived from one of these examples should be considered a basis from which you begin when examining the evidence available to you. These examples are not intended as an exhaustive list. Other methods or combinations of methods to determine a base figure may be used, subject to approval by the FAA.*

*(1) Use DBE Directories and Census Bureau Data. Determine the number of ready, willing and able ACDBEs in your market area from your ACDBE directory. Using the Census Bureau's County Business Pattern (CBP) data base, determine the number of all ready, willing and able businesses available in your market area that perform work in the same NAICS codes. Divide the number of ACDBEs by the number of all businesses to derive a base figure for the relative availability of ACDBEs in your market area.*

*2) Use an Active Participants List. Determine the number of ACDBEs that have participated or attempted to participate in your airport concessions program in previous years. Determine the number of all businesses that have participated or attempted to participate in your airport concession program in previous years. Divide the number of ACDBEs who have participated or attempted to participate by the number for all businesses to derive a base figure for the relative availability of ACDBEs in your market area.*

*(3) Use data from a disparity study. Use a percentage figure derived from data in a valid, applicable disparity study.*

*(4) Use the goal of another recipient. If another airport or other DOT recipient in the same, or substantially similar, market has set an overall goal in compliance with this rule, you may use that goal as a base figure for your goal.*

*(5) Alternative methods. (i) You may use other methods to determine a base figure for your overall goal. Any methodology you choose must be based on demonstrable evidence of local market conditions and be designed to ultimately attain a goal that is rationally related to the relative availability of ACDBEs in your market area.*

We have decided to use the DBE Directories and Census Bureau Data method for determining

availability as follows:

The most recent available census bureau data is for 2016. The NAICS codes for the various trades typically utilized by car rental concessions were determined through a survey of car rental concessionaires and research and are shown on the chart below. Both DBEs and ACDBEs from the IDT DBE Directory have been included as any firm that meets the DBE eligibility requirements are potential ACDBEs.

<b>Table 1 – U.S. Census / Idaho Unified Certification Program Directory</b>				
<b>Description</b>	<b>NAICS</b>	<b>Census</b>	<b>Directory</b>	<b>DBE/ACDBE %</b>
Door Maintenance/Repair	236220	334	5	1.50%
Concrete Maintenance	238110	288	6	2.08%
Electrical	238210	556	5	0.90%
Backflow Testing	238220	698	1	0.14%
HVAC Maintenance	238220	698	1	0.14%
Plumbing	238220	698	1	0.14%
Elevator Maintenance	238290	40	0	0.00%
Printing	323111	69	1	1.45%
Signage	323111	69	1	1.45%
Fuel Maintenance	333911	3	0	0.00%
GPS Devices	334220	3	0	0.00%
Auto Parts	423120	69	0	0.00%
Tires	423130	7	0	0.00%
Computer Support/Materials	423430	33	1	3.03%
Luggage Carts/Wheelchairs	423450	52	0	0.00%
Car Wash Maintenance	423850	23	0	0.00%
Cleaning Supplies	423850	23	0	0.00%
Fire Safety/Suppression	423990	53	3	5.66%
Office Expense	424120	15	0	0.00%
First Aid	424210	51	0	0.00%
Fuel/Oil/Energy	424720	5	0	0.00%
Car Dealerships <sup>1</sup>	441110	21,427	2	0.01%
Auto Transport	484230	137	0	0.00%
Roadside Assistance	488410	58	0	0.00%
Towing	488410	58	0	0.00%
Delivery Svc	492110	98	0	0.00%
Insurance	524210	837	0	0.00%

<b>Table 1 – U.S. Census / Idaho Unified Certification Program Directory</b>				
Description	NAICS	Census	Directory	DBE/ACDBE %
Equipment Rental (GPS)	532210	25	0	0.00%
Legal Services	541110	850	0	0.00%
Accounting	541211	431	0	0.00%
Consulting	541611	309	3	0.97%
Background Checks	541612	31	3	9.68%
Asset Recovery	561491	5	0	0.00%
Building Security	561621	35	2	5.71%
Security	561621	35	2	5.71%
Keys/Locks	561622	23	0	0.00%
Pest Control	561710	64	1	1.56%
Janitorial Services	561720	420	1	0.24%
Drug Testing	621999	29	0	0.00%
Auto Repair	811111	482	0	0.00%
Auto Body Repair	811121	209	0	0.00%
Uniform Cleaning	811122	66	0	0.00%
Windshield Repair	811122	66	0	0.00%
Device Repair & Maintenance	811211	10	0	0.00%
Uniforms	812331	5	0	0.00%

<sup>1</sup>Car dealership ACDBE availability is based on a national geographic region using the DBE-Connect database.

The following contains weighted availability calculations based on information obtained from car rental companies at other Airports surveyed in the past several years as we do not have this information from car rental companies at Boise Airport:

<b>Table 2 – Weighted ACDBE Availability (Based on Directory/Census)</b>				
Description	NAICS	% of \$ Expenditures (A)	DBE/ACDBE % (B) [From Table 1]	Weighted Availability (A X B)
Door Maintenance/Repair	236220	0.10%	1.50%	0.00%
Concrete Maintenance	238110	0.50%	2.08%	0.01%
Electrical	238210	0.10%	0.90%	0.00%
Backflow Testing	238220	0.00%	0.14%	0.00%
HVAC Maintenance	238220	0.10%	0.14%	0.00%

<b>Table 2 – Weighted ACDBE Availability (Based on Directory/Census)</b>				
<b>Description</b>	<b>NAICS</b>	<b>% of \$ Expenditures (A)</b>	<b>DBE/ACDBE % (B) [From Table 1]</b>	<b>Weighted Availability (A X B)</b>
Plumbing	238220	0.00%	0.14%	0.00%
Elevator Maintenance	238290	0.40%	0.00%	0.00%
Printing	323111	0.00%	1.45%	0.00%
Signage	323111	0.00%	1.45%	0.00%
Fuel Maintenance	333911	0.10%	0.00%	0.00%
GPS Devices	334220	0.10%	0.00%	0.00%
Auto Parts	423120	0.20%	0.00%	0.00%
Tires	423130	1.60%	0.00%	0.00%
Computer Support/Materials	423430	0.10%	3.03%	0.00%
Luggage Carts/Wheelchairs	423450	0.00%	0.00%	0.00%
Car Wash Maintenance	423850	0.30%	0.00%	0.00%
Cleaning Supplies	423850	0.00%	0.00%	0.00%
Fire Safety/Suppression	423990	0.00%	5.66%	0.00%
Office Expense	424120	0.10%	0.00%	0.00%
First Aid	424210	0.00%	0.00%	0.00%
Fuel/Oil/Energy	424720	12.30%	0.00%	0.00%
Transport (Auto)	484230	1.60%	0.00%	0.00%
Roadside Assistance	488410	0.00%	0.00%	0.00%
Towing	488410	0.10%	0.00%	0.00%
Delivery Svc	492110	0.00%	0.00%	0.00%
Insurance	524210	2.10%	0.00%	0.00%
Equipment Rental (GPS)	532210	0.00%	0.00%	0.00%
Legal Services	541110	0.00%	0.00%	0.00%
Accounting	541211	0.10%	0.00%	0.00%
Consulting	541611	0.10%	0.97%	0.00%
Background Checks	541612	0.00%	9.68%	0.00%
Asset Recovery	561491	0.00%	0.00%	0.00%
Building Security	561621	0.00%	5.71%	0.00%
Security	561621	0.20%	5.71%	0.01%
Keys/Locks	561622	0.00%	0.00%	0.00%

<b>Table 2 – Weighted ACDBE Availability (Based on Directory/Census)</b>				
Description	NAICS	% of \$ Expenditures (A)	DBE/ACDBE % (B) [From Table 1]	Weighted Availability (A X B)
Pest Control	561710	0.00%	1.56%	0.00%
Janitorial Services	561720	0.90%	0.24%	0.00%
Drug Testing	621999	0.00%	0.00%	0.00%
Auto Repair	811111	4.60%	0.00%	0.00%
Auto Body Repair	811121	0.70%	0.00%	0.00%
Windshield Repair	811122	0.10%	0.00%	0.00%
Device Repair & Maintenance	811211	0.00%	0.00%	0.00%
Uniform Cleaning	812331	0.00%	0.00%	0.00%
Uniforms	812331	0.00%	0.00%	0.00%
<b>Total (Excluding Vehicle Purchases)</b>		<b>26.70%</b>		<b>0.03%</b>
Vehicle Purchases	441110	73.30%	0.01%	0.01%
<b>Total Purchases</b>		<b>100.00%</b>		<b>0.04%</b>

\*Weighting of categories obtained from an analysis of purchases conducted for San Diego International

**We therefore propose the base goal at 0.04%.**

**Step 2 - Examine the data to determine what adjustment, if any, is needed to the Base Figure**

The ACDBE regulation (49 CFR part 23) provides for a Step 2 adjustment of the developed base goal for a variety of factors, including the current capacity of ACDBEs to perform work in the concession program, as measured by the volume of work ACDBEs have performed in recent years. ACDBE achievement for the most recent three-year period is as follows:

<b>Actual Past History of ACDBE Participation</b>			
YEAR	TOTAL Purchases	ACDBE Purchases	ACDBE %
2017	\$12,141,943	\$418,125	3.44%
2016	\$43,006,355	\$467,207	1.09%
2015	\$37,047,222	\$481,965	1.30%

Adjusting the base goal for past history results in the following:



$$\begin{aligned}\text{Base Goal (0.04\%)} + \text{Past History (1.30\%)} &= 1.34\% \\ 1.34\% \div 2 &= 0.67\%\end{aligned}$$

**We, therefore, propose the adjusted Car Rental ACDBE Goal at 0.67%.**

### **Race-Neutral/Race-Conscious Recommendation**

The current car rental agreements do not include a race conscious ACDBE goal, therefore the goal will be set as race-neutral. The agreements will expire on September 30, 2021. We will conduct a revised goal analysis prior to the solicitation and make any necessary adjustments.

### **Consultation with Stakeholders**

In accordance with 49 CFR part 23, §23.43, the airport has sent emails and followed up with phone calls to the following stakeholders regarding this three-year goal:

[Add List]

The results of the consultations are: TBD