



COLUMBUS
REGIONAL AIRPORT AUTHORITY

AIRPORT CONCESSIONS DISADVANTAGED BUSINESS ENTERPRISE (ACDBE) PROGRAM

Car Rental GOAL SETTING METHODOLOGY

FFY 2024-2025-2026
49 CFR Part 23



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FY 2024-2025-2026 Airport Concessions Disadvantaged Business Enterprise (ACDBE)

Overall Three-Year Goals Report for Car Rentals

In compliance with Subpart D of 49 CFR Part 23, The Authority shall establish separate overall three-year goals for the participation of ACDBEs in rental car and non-rental car concession related contracting opportunities. The Regulations require a two-step process for goal setting. This process intends to provide the maximum flexibility for grant recipients, while ensuring that goals are based on availability of ready, willing and able ACDBEs in each recipient's relevant market.

Section 23.45: Overall Goal Calculation for Car Rentals

Amount of Goal

The Authority's overall goal for car rentals during the period beginning October 1, 2023 and ending September 30, 2026 is: **(1.90%)**.

The concession opportunities anticipated during this goal period are goods and services purchased by car rental concessionaires with total estimated annual spend of \$60,697,732 for FFYs 2024 - 2026. John Glenn Columbus International continues to work on increasing the participation in Car Rental concessions.

If a new car rental concession opportunity or goods and services supply opportunities arise prior to the end of this goal period and the estimated average of annual gross revenues are anticipated to be \$200,000 or greater, the Authority will submit an appropriate adjustment to the overall goal. This will be submitted to the FAA for approval no later than 90 days before issuing the solicitation for the new concession opportunity. (23.45(i)).

The Authority has determined that the market area it draws from for car rental concessions is the State of Ohio. This is the geographical area in which most firms that seek to do car rental concessions business with the airport are located. Additionally, this is also the geographical area in which the firms that receive the majority of concessions related revenues are located.

Methodology used to Calculate Overall Goal

Goods and Services

We determined the goal based on outreach for the purchase of goods and services from certified ACDBE or potential ACDBE firms. This basis is in lieu of a goal based upon a percentage of total gross receipts of car rental operations at John Glenn Columbus International Airport. We will make a good faith effort to pursue opportunities to meet the goal. We will continue to consult with the Ohio DOT UCP, the car rentals at the airport, airports in our region, minority and women businesses in the State of Ohio and other publications to find prospects. We will work with our car rental agencies and outreach to ACDBEs for car rental goods and services and encourage certified ACDBEs not certified in Ohio to apply for certification

in Ohio so we can count the ACDBE participation in goals and uniform reports. The Ohio DOT UCP is aware of this requirement and is on board to assist and process certifications as required.

Car Rental Agencies stated the services they may need are fleet, key blanks, oil change services, insurance, office supply, janitorial services, tires, auto repair services, auto part supplies, security services, upholstery, payroll services, towing services, car wash, landscaping services and freight transportation.

We cannot locate an ACDBE in our region that sells cars (if applicable). We have encouraged the car rentals to seek these options and to have the supplier become certified in the State of Ohio.

Base Goal

Goods and Services

We can meet the percentage goal by including the purchase from DBEs and ACDBEs of goods and services used in businesses at the airport. The dollar value from purchases of goods and services from DBEs and ACDBEs may be added to the numerator, and the dollar value from purchases of goods and services from all firms (ACDBEs and non-ACDBEs) may be added to the denominator.

There are no ACDBE car rental concession opportunities anticipated during this goal period. If a new car rental concession opportunity arises prior to the end of this goal period and the estimated average of annual gross revenues are anticipated to be \$200,000 or greater, the Authority will submit an appropriate adjustment to the overall goal. This will be submitted to the FAA for approval no later than 90 days before issuing the solicitation for the new concession opportunity. (23.45(i).

The ACDBE and DBE goods and services spend for FFY23 (\$59,679,051) was disproportionately higher than the average annual spend and will not be able to be duplicated annually. Therefore, the FF23 spend was not utilized to calculate the 2024-2026 goal. The Base Goal for this goal period of 2024-2026 is \$8,966,562. The base goal is based upon the average 2020-2022 total DBE/ACDBE goods and services spend for all car rental concessions of \$2,988,854 multiplied by 3 years of the goal period:

Fiscal Year	ACDBE and DBE Goods & Services Spend for ALL Car Rental Concessions	Total Goods & Services Spend for ALL Car Rental Concessions
Base Year: 2020	\$1,890,558	\$55,517,805
2021	\$5,958,043	\$67,371,904
2022	\$1,117,963	\$59,203,4851
2023*	\$59,679,051	\$136,827,641
3-year average 20 -22	\$2,988,854	\$60,697,732
4-year average	\$17,161,404	\$79,730,209

***Forecast amount**

Base Goal = \$2,988,854 X 3 = \$8,966,562

Step 1: Relative Availability Base Calculation 23.51(c)(5)(ii) We determined the base figure for the relative availability of ACDBEs that can be used for car rental purchases of goods and services. The base figure was calculated as follows:

Base figure = Ready, willing, and able car rental ACDBEs in the market area
 All ready, willing, and able car rental concession firms in the market area

Car Rental

Work Area	NAICS Codes	# of ACDBE/DBE firms (OH)	# of Firms in Market Area (OH)	% of ACDBE/DBE Firms that may be available
New Car Dealers	441110	0	873	0%
Motor Vehicle Supplies	423120	1	465	0.21%
Keys-Hardware Merchant	423710	3	256	1.17%
Other Misc. Durable & Non-Durable Goods	423990/424990	14	243	5.76%
Other Chemical & Allied Products	424690	9	399	2.26%
Automobile Parts/Tires	441310/441320	0	1,518	0.00%
All Other General Merchandise	452990/455219	3	0	#DIV/0!
Gifts, Novelty	453220	1	550	0.18%
Specialized Freight Trucking	484220/484230	194	1,263	15.36%
Other Support Activities for Road Transportation	488490	7	74	9.46%
Insurance	524210/524298	7	4,573	0.15%
Various Management & Consulting Services	541611/541612/541613/541618	66	1,926	3.43%
Advertising	541810/541850	12	444	2.70%
Office Administrative Services	561110	9	1,137	0.79%
Janitorial Services	561720	28	1,931	1.45%
Landscaping Services	561730	36	4,163	0.86%
All Other Miscellaneous Waste	562998	2	57	3.51%
Automotive Glass Replacement	811122	1	125	0.80%
Car Washes	811192	2	602	0.33%
All Other Automotive Repair & Maintenance	811198	0	96	0.00%
TOTAL		395	20,695	1.90%

Source: Ohio UCP Directory, U.S. Census Bureau, County Business Patterns

The data source or demonstrable evidence used to derive the numerator was the Ohio UCP Directory as of October 17, 2023. This represents the universe of minority and women-owned businesses that are certified DBEs and ACDBEs in the State of Ohio and could potentially participate in our car rental concession program. The link to the Ohio UCP Website is <http://www.dot.state.oh.us/Divisions/ODI/SDBE/Pages/UCP.aspx>.

The data source or demonstrable evidence used to derive the denominator was Census Bureau data. NAICS codes identified for existing and potential concession opportunities are listed in the above table.

$$\text{Base figure} = \frac{395}{20,695} = 1.90\%$$

Step 2: 23.51(d)

After calculating a base figure of the relative availability of ACDBEs, we examined evidence to determine whether an adjustment was needed to the base figure in order to arrive at the overall goal. We determined that an adjustment to the goal to reflect the actual utilization of ACDBEs by the rental car agencies is not merited. We have held and participated in various outreach and networking events to help the rental car agencies increase their utilization of ACDBEs. The purchasing model used by the rental car agencies can be a hurdle, although the number of ACDBEs has increased significantly.

In order to reflect as accurately as possible, the ACDBE availability and participation we would expect our overall goal for car rental concessions is **1.90%**. The goal was maintained at 1.90% to reflect the ACDBE availability and participation that has been obtained historically and to account for the model that the car rental companies use to obtain goods/services at the national level versus the local level. The Authority has participated in the nationwide car rental and airport outreach events to help the car rental companies network with ACDBE firms.

Consultation with Stakeholders (23.43)

To solicit consultation regarding our ACDBE Goal, the ACDBE plan and goal are posted on the Columbus Regional Airport Authority's website at www.columbusairports.com, under the "Doing Business/Business Diversity" link. The Authority also attended diverse business outreach events to consult with minority and women business enterprise advocacy groups.

Breakout of Estimated Race-Neutral & Race Conscious Participation **Section 23.51**

The Authority will meet the maximum feasible portion of its overall goal by using race-neutral means of facilitating ACDBE participation. The Authority uses the following race-neutral means to increase ACDBE participation:

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 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; and
6. Providing information concerning the availability of ACDBE firms to competitors to assist them in obtaining ACDBE participation.

We estimate that, in meeting our overall goal of 1.90%, we will obtain 0% from race-neutral participation and 1.90% through race-conscious measures.

The following is a summary of the basis of our estimated breakout of race-neutral and race-conscious ACDBE participation:

1. ACDBE participation on concession leases that did not have ACDBE requirements.
2. Extent of your race-neutral business assistance efforts.

If we project that race-neutral measures, standing alone, are not sufficient to meet our overall goal, we will use the following race-conscious measures to meet the overall goal:

1. We will establish concession-specific goals for concession opportunities.
2. Negotiate with potential concessionaires to include ACDBE participation through direct ownership arrangements or measures, in the operation of the concession.
3. With prior FAA approval, other methods that take a competitor's ability to provide ACDBE participation into account in awarding a concession.

In order to ensure that our ACDBE program will be narrowly tailored to overcome the effects of discrimination, if we use concession specific goals, we will adjust the estimated breakout of race-neutral and race-conscious participation as needed to reflect actual ACDBE participation (see 26.51(f)) and we will track and report race-neutral and race conscious participation separately. For reporting purposes, race-neutral ACDBE participation includes, but is not necessarily limited to, the following: ACDBE participation through a prime contract that an ACDBE obtains through customary competitive procurement procedures; ACDBE participation through a subcontract on a prime contract that does not carry ACDBE goal; ACDBE participation on a prime contract exceeding a concession specific goal; and ACDBE participation through a subcontract from a prime contractor that did not consider a firm's ACDBE status in making the award.

We will maintain data separately on ACDBE achievements in those contracts with and without concession specific goals, respectively.