



**COLUMBUS**  
REGIONAL AIRPORT AUTHORITY

**AIRPORT CONCESSIONS  
DISADVANTAGED BUSINESS  
ENTERPRISE (ACDBE)  
PROGRAM**

**Non-Car Rental  
GOAL SETTING METHODOLOGY**

FFY 2020-2021-2022  
49 CFR Part 23



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**Rickenbacker International Airport**

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## **FFY 2020-2021-2022 Airport Concessions Disadvantaged Business Enterprise (ACDBE)**

### **Overall Three-Year Goals Report Non-Rental Car Concessions**

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 Non-Car Rental Concessions**

The Authority has established an overall ACDBE goal for FFY 2020-2022 of 1%, which is applicable to non-car rental concessions contracting opportunities at Rickenbacker International 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 Authority anticipates meeting the newly established ACDBE goal of 1% in one of three ways or any combination of the three. Either new concession opportunities, renegotiating current concessions or through utilizing ACDBE firms for goods and services. If other new concession opportunities arise prior to the end of this goal period and the estimated average of annual gross revenues are anticipated to be \$200,000.00 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 concessions is the Columbus Ohio, Metropolitan Statistical Area (MSA) within the State of Ohio. The Columbus MSA is comprised of the following counties, Delaware, Fairfield, Franklin, Hocking, Licking, Madison, Morrow, Perry, Pickaway and Union. This is 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 receive a substantial majority of concessions related revenues are located.

#### **Methodology Used To Calculate Overall Goal**

##### Goods and Services

The Authority may meet the percentage goal by including the purchase from ACDBEs of goods and services used in businesses conducted at the airport. We, and the businesses at the airport, shall make good faith efforts to explore all available options to achieve, to the maximum extent practicable, compliance with the goal through direct ownership arrangements, including joint ventures and franchises. The dollar value from purchases of goods and services from 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.

##### Management Contract or Subcontract

The Authority may meet the percentage goal by including any business operated through a management contract or subcontract with an ACDBE. We, and the businesses at the airport, will add the dollar amount of a management contract or subcontract with an ACDBE to the total participation by ACDBEs in airport concessions (both the numerator AND the denominator) and to the base from which the airport's percentage goal is calculated. However, the dollar amount of a management subcontract or subcontract

with a non-ACDBE and the gross revenues of business activities to which the management contract or subcontract pertains will not be added to this base in either the numerator or denominator.

**Base of goal** = Avg. 3-yr Projected Concession Revenue (FFY 2020-2022) = **\$1,887,866**

**Step One: Relative Availability Base Calculation 23.51 (c)**

We determined the base figure for the relative availability of ACDBEs other than car rentals. The base figure was calculated as follows:

**A. Base figure** = Ready, willing, and able non-car rental ACDBEs in the market area  
All ready, willing, and able non-car rental concession firms in the market area

<i>Work Area</i>	<i>NAICS Code</i>	<i># of ACDBE Firms (OH)</i>	<i># of Establishments Columbus MSA (OH)</i>
<i>Retail</i>	<i>453</i>	<i>13</i>	<i>599</i>
<i>Vending Machine Operators</i>	<i>454210</i>	<i>1</i>	<i>36</i>
<i>Hotel</i>	<i>721</i>	<i>0</i>	<i>309</i>
<i>Food/Beverage</i>	<i>722</i>	<i>25</i>	<i>3,865</i>
<b>TOTAL</b>		<b>39</b>	<b>4,918</b>
<i>Percentage of ACDBE Firms of All Firms In Market Area</i>			<b>1%</b>

Source: Ohio UCP Directory, U.S. Census Bureau, 2016 County Business Patterns

The data source or demonstrable evidence used to derive the numerator was the Ohio UCP Directory as of July 10, 2019. This represents the universe of minority and women-owned businesses that are certified ACDBEs in the State of Ohio and could potentially participate in our concession program. The website link to the Ohio UCP 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.

**Base figure** =  $\frac{39}{4,918}$  = 1%

When we divided the numerator by the denominator we arrived at the base figure for our overall goal for non-car rental concessions of 1 %.

**Step 2: 23.51(d)**

After calculating the base figure of the relative availability of ACDBEs, we examined evidence to determine what adjustment was needed to the base figure in order to arrive at the overall goal.

In order to reflect as accurately as possible the ACDBE participation we would expect in the absence of discrimination, we have adjusted our base figure by 0%. Our overall goal for non-car rental concessions is 1%.

The data used to determine the adjustment to the base figure was:

**A. Outreach Efforts**

In addition to the certified ACDBE firms identified from the Ohio UCP directory, the Authority engages in several outreach events and efforts to identify vendors that may offer goods and services that can be used in the Authority's concession program. We also seek firms who have expressed interest in participating in our concession program either through direct contact with concession program staff, purchasing staff and/or the ACDBELO and the Office of Business Diversity. Upon registration as a potential supplier, the firms' information is stored in an accessible external database, which enables Authority staff to generate automatic e-mail notifications of business opportunities that match their company's capabilities. Upon receipt, the company will have the opportunity to review the opportunity and given instructions to download any solicitation documents. As a result of these efforts, we have adjusted our base figure accordingly.

**B. Past Participation**

It has been determined that an adjustment to Rickenbacker's non-car rental ACDBE goal is not justifiable at this time. Rickenbacker International Airport (LCK) was not classified as a primary airport, therefore, was not required to submit an ACDBE goal. LCK was classified as a Non-hub Primary Airport by the FAA in fiscal year 2015, however, the concessions revenue did not reach the \$200,000 minimum until December 2016. As a result, there is very little history of accomplishments in which to use for a Step 2 adjustment.

The Authority also reviewed projected ACDBE participation based on estimated gross receipts for 2020-2022. See **Exhibit 1**.

Utilizing data based on past performance and anticipated ACDBE participation in Federal Fiscal Years 2020-2022, the projected ACDBE participation in fiscal year 2020-2022 in airport concessions at Rickenbacker International Airport estimates an average \$18,879 or 1% in total gross receipts.

**FFY 2020-2022**

$$\frac{\text{Average Projected ACDBE Concession Gross Receipts}}{\text{Average of All Projected Concession Gross Receipts}} = \frac{\$18,879}{\$1,887,866} = 1.0\%$$

**C. Disparity Study**

There were no disparity studies conducted within our jurisdiction that relate to concessions. We will continue to contact state and local agencies to determine when a disparity study becomes available.

#### **D. Differences in Market Area and Concessions Program**

The Authority did not rely on the goal setting procedures of another sponsor to derive our goal. Therefore, no adjustments for differences in market areas and concessions programs are needed.

#### **E. Available Evidence from Related Fields that Affect Opportunities for ACDBEs to Form, Grow, and Compete**

There is no statistical evidence available from concession – related fields that demonstrate, statistically, that ACDBEs face challenges in getting financing, bonding, and insurance or other opportunities that enable them to form, grow and compete. Therefore, no adjustments were made.

#### **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](http://www.columbusairports.com), under the “*Doing Business/Business Diversity*” link. The Authority also held an “Open House” for interested parties to discuss and network about ACDBE availability, how to become a certified ACDBE, and current and future opportunities in the Authority's concession program. Additionally, the Authority will solicit comments on the proposed overall FFY 20-22 three-year goal from the vendor community.

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

#### **Race-Neutral Methods**

The Authority intends to use race-neutral methods to the maximum extent feasible to achieve its overall goal. ACDBE participation that is obtained on contracts that have no specific ACDBE goal or where ACDBEs status in awarding a contract is not considered shall be considered race-neutral ACDBE participation. In addition, the Authority will use the following measures as appropriate:

1. Locating and identifying ACDBEs and other small businesses who may be interested in participating as concessionaires at the Airport;
2. Notifying ACDBEs of concession opportunities and encouraging them to compete, when appropriate;
3. Structuring concession activities so as to encourage and facilitate the participation of ACDBEs when practical;
4. Ensuring that competitors for concession opportunities are informed during pre-solicitation meetings about how the Authority's ACDBE Program will affect the procurement process;
5. Providing technical assistance to ACDBEs in overcoming limitations, such as inability to obtain bonding or financing;
6. Providing technical assistance and outreach programs to provide information to ACDBEs regarding concession and management opportunities at the Airport through the internet and through various Minority and Small Business Conferences and Outreach Events; and
7. 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% we will obtain 0% from race-neutral participation and 1% 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. The extent that the Authority met or exceeded our ACDBE goals in the past:
2. ACDBE participation on leases that did not have ACDBE requirements;
3. Extent of the Authority's race-neutral business assistance efforts.

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

1. We will establish concession-specific goals for particular concession opportunities.
2. Negotiate with potential concessionaires to include ACDBE participation through direct ownership arrangements or measures, in operation of the concession.
3. With prior FAA approval, other methods that takes 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 ADCBE participation includes, but is not necessarily limited to the following: ADCBE participation through a prime contract that an ADCBE obtains through customary competitive procurement procedures; ADCBE participation through a subcontract on a prime contract that does not carry an 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.

**EXHIBIT 1 - ESTIMATED GROSS RECEIPTS FOR NON-CAR RENTAL CONCESSIONS AT  
RICKENBACKER INTERNATIONAL AIRPORT**

**NON - CAR RENTAL  
CONCESSIONS**

	<u>FFY 2020*</u>	<u>FFY 2021*</u>	<u>FFY 2022*</u>	<u>Average 2020-2022*</u>
<i>Food &amp; Beverage</i>	290,500	296,310	302,236	296,349
<i>Hotel</i>	1,539,892	1,570,690	1,602,104	1,570,895
<i>Vending</i>	20,214	20,619	21,031	20,621
<b>TOTAL</b>	<b>\$1,850,607</b>	<b>\$1,887,619</b>	<b>\$1,925,371</b>	<b>\$1,887,866</b>
<b>Projected ACDBE Participation</b>	\$18,506	\$18,876	\$19,254	\$18,879
<b>ACDBE Participation %</b>	<b>1.00%</b>	<b>1.00%</b>	<b>1.00%</b>	<b>1.00%</b>
<b>*Forecasted amounts</b>				

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### **Overall Three-Year Goals Report Rental Car Concessions**

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#### **Section 23.45 Overall Goal Calculation for Car Rental Concessions**

Rickenbacker International Airport does not have any on airport car rental companies, therefore, a goal does not need to be established. If new car rental concession opportunities arise prior to the end of this goal period and the estimated average of annual gross revenues are anticipated to be \$200,000.00 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)).