Attachment E

Overall Goal Calculation for Concessions Other Than Car Rentals
For FYs 2023- 2025

Amount of Goal

The Monroe Regional Airport (MLU) does not receive, nor does it anticipate receiving annual revenue from concessions other than car rental during the period beginning October 1, 2022, and ending September 30, 2025, in excess of $200,000. Consequently, no goal has been set for these concessions.

Attachment E

Overall Goal Calculation for Car Rentals
For FYs 2023 - 2025

Amount of Goal

The Monroe Regional Airport's (MLU) overall goal for car rentals during the period beginning October 1, 2022, and ending September 30, 2025, is **0.45%** of the total gross receipts of car rental operations at the Airport.

The concession opportunities anticipated during this goal period are Fuel Sales, Tire Dealers, Auto Part Suppliers, Towing, Insurance Agencies, General Auto Repair, Auto Repair/Body Work, Windshield Repair, New Car Sales, Office Equipment/Supplies, Accounting/Bookkeeping, and Janitorial Services. 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 Airport will submit an appropriate adjustment to the overall goal. This will be submitted to FAA for approval at least 6 months before executing the new concession agreement. (23.45(i)).

The Monroe Regional Airport has determined that its ACDBE market area includes the 9 parishes surrounding the City of Monroe (East Carroll, Franklin, Madison, Morehouse, Ouachita, Richland, Tensas, Union and West Carroll Parishes). The Airport recently hosted an outreach effort with the Rental Car Operators at MLU. Based on this effort the experience of the operators, and participation through other DBE Programs at MLU, the Airport has decided that it is appropriate to use this market area for its ACDBE Program.

Methodology used to Calculate Overall Goal

Goods and Services

We intend to meet the percentage goal by including the purchases from ACDBEs of goods and services used in businesses at the Airport. 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.

Step 1: 23.51(c)

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

$$\text{Base figure} = \frac{\text{Ready, willing, and able car rental ACDBEs in the market area}}{\text{All ready, willing, and able car rental firms in the market area}}$$

The data source or demonstrable evidence used to derive the numerator is the Louisiana Unified Certification Program Listing found at:

http://www.dotd.state.la.us/cgi-bin/construction.asp

The data source or demonstrable evidence used to derive the denominator is United States Census Bureau Database of County Business patterns found at:

https://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml

The following table presents the summary of the relevant data:

NAICS CODE	Type of Work	Total ACDBEs	All Firms
441320	Tire dealers	0	34
561720	Janitorial	2	14
441310	Auto Parts	0	54
811120 811122	Windshield Repair	0	29
424720	Petroleum-Fuel Sales	0	3
441229	Motor Vehicle Dealers	0	16
488410	Towing	0	4
524210	Insurance Agencies and Brokerages	0	145
811111 811198	General Auto Repair	0	73
423420	Office Equipment/Supplies	0	11
541211 541219	Accounting/Bookkeeping	0	63
		2	**446**

Relative Availability **0.45%**

When we divided the numerator by the denominator, we arrived at the base figure for our overall goal for car rental concessions of **0.45%.**

Relative Availability = 2 / 446 = 0.45%

Step 2: 23.51(d)

After calculating a 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 not adjusted our base figure since doing so would artificially lower the goal.

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

a. **Past participation** – We evaluated the current capacity of ACDBEs to perform work in our car rental concessions program by measuring the volume of work ACDBEs have performed in the past.

FISCAL YEAR	GOAL	ACCOMPLISHMENT
2019	0.73%	0.00%
2020	0.28%	0.00%
2021	0.28%	0.0035%

Median Accomplishment – **0.00%**

b. **Disparity study** – There are no disparity studies conducted within our jurisdiction that relate to concessions. We will continue to contact state and local agencies to determine when disparity study becomes available.

c. **Differences in Market Area and Concessions Program –** Not Applicable.

d. **Available evidence from related fields that affect opportunities for ACDBEs to form, grow, and compete** – Not Applicable.

The median percentage of ACDBE accomplishments over recent years is therefore determined to be **0.0%**. Since the rental car companies at MLU have shown very little ACDBE participation over recent years, it is not appropriate in this case to adjust the overall goal by determining the average of the median accomplishment and the relative availability as it would artificially lower the goal. Therefore, the overall goal for FYs 2020-2022 is the base figure of **0.45%**.

Consultation with Stakeholders (23.43)

The Monroe Regional Airport encourages the participation of Disadvantaged Business Enterprises in its Airport Concessions Program. In an effort to reach the available ACDBE community, seek out public input into the goal setting process, and to ensure wide distribution of the information contained in this document, the Airport corresponds and consults with the Monroe Chamber of Commerce, existing concessionaires, and other organizations which could be expected to have information concerning the availability of disadvantaged businesses. An open dialogue with these entities will afford the Airport the opportunity to reach out to interested parties and encourage meaningful participation in its concessions program by ACDBEs. Additionally, the Airport will make copies of its ACDBE Program available to each of these organizations for distribution to its members.

Prior to the COVID outbreak, the Airport hosted an outreach meeting with the Rental Car operators at MLU on September 24, 2019, to discuss ways to increase ACDBE participation. Among the ideas to foster more participation are:

- Investigate the possibility of using second-tier spending (with goods the RACS purchase directly form MLU) to increase ACDBE participation
- The RACs agreed to reach out to vendors that are certified in other states to encourage them to become certified in Louisiana
- The Airport provided a list to the RACs of ACDBE firms that are certified in Louisiana

The Airport is currently preparing a new solicitation for proposals from the rental car operators which encourages them to find commercially useful opportunities for DBE participation.

Additionally, the Airport advertised availability of the program on its website with the following notice of availability:

WEBSITE PUBLIC NOTICE

Airport Concessions Disadvantaged Business Enterprise (ACDBE) Goals for Federal Fiscal Years 2020 through 2022

The Monroe Regional Airport hereby announces the availability of its Airport Concessions Disadvantaged Business Enterprise Program. This program includes the goals set out under Federal Aviation Regulations, which will remain in effect from October 1, 2022, and ending September 30, 2025, at which time the goals will be updated. The Airport has set a goal of **0.45%** of the annual revenue realized from Car Rental Concessions that occur at the Airport. The Program and the proposed goals and goal setting methodology are available for inspection between 8:00 a.m. and 5:00 p.m., Monday through Friday, beginning September 6, 2022, through October 5, 2022, in the offices of the Airport Director, 5400 Operations Road, Monroe, Louisiana 71203.

Mr. Charles Butcher
Airport Director
Monroe Regional Airport
5400 Operations Road
Monroe, LA 71203

Federal Aviation Administration
Office of Civil Rights - AWP-9
Post Office Box 92007
Los Angeles, CA 90009-2007

PUBLIC COMMENTS

Should any comments be received as a result of the public participation process, they will be addressed, and we will notify the FAA's Office of Civil Rights.

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

The Monroe Regional Airport will meet the maximum feasible portion of its overall goal by using race-conscious means of facilitating ACDBE participation. The Monroe Regional Airport uses the following race-conscious 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;*
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.*

We estimate that, in meeting our overall goal of **0.45%,** we will obtain **0%** from race-neutral participation and **0.45%** through race-conscious measures.

Based on the lack of historic ACDBE participation, MLU believes that race-conscious measures are warranted. This is because there has been very little ACDBE participation over the last three years.

Given this fact, it is apparent that race-neutral measures, standing alone, are not sufficient to meet an overall goal. Consequently, we intend to use the following race-conscious measure to meet the overall goal:

Establish concession-specific goals for particular concession opportunities;

1. *Consult with our rental car operators and stakeholders to encourage participation by identifying opportunities for them to find and work with available ACDBEs;*
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, we will consider 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:

1. *ACDBE participation through a prime contract that an ACDBE obtains through customary competitive procurement procedures;*
2. *ACDBE participation through a subcontract on a prime contract that does not carry ACDBE goal;*
3. *ACDBE participation on a prime contract exceeding a concession specific goal; and*
4. *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.