

## ATTACHMENT 4

### Section 23.45: Overall Goal Calculation for Concessions Other Than Car Rentals

**Amount of Goal** 0 %

**Name of Recipient:** Bert Mooney Airport

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**Goal Period:** FY-2023, 2024, 2025 – October 1, 2022 through September 30, 2024

**Overall Three-Year Goal:**

The average annual gross receipts for the restaurant is projected to be about \$50,000, this is well below the \$200,000 requirement. Therefore, there is no goal required.

## Attachment 5

### Section 23.45: Overall Goal Calculation for Car Rentals

#### Section 23.45: Overall Goal Calculation for Car Rental Company Concessions

Amount of Goal: 0.11%

**Name of Recipient:** Bert Mooney Airport Authority

**Goal Period:** FY-2023, 2024, 2025 – October 1, 2022 through September 30, 2024

**Overall Three-Year Goal:**

*0.11%, to be accomplished through 0% RC and 0.11% RN*

**Methodology used to Calculate Overall Goal:**

The Airport in conducting this goal-setting process is determining the extent, if any, to which the firms in the market area have suffered discrimination or its effects in connection with concession opportunities and related business opportunities.

**Goal Based on Goods and Services Purchases - Determination:**

Upon review of the market, it appears that all or most of the goal is likely to be met through the purchases by car rental companies of vehicles or other goods/services from ACDBEs. This is because no certified ACDBE car rental companies exist within the market. As such, the **Bert Mooney Airport Authority** has structured the goal entirely in terms of the purchases of goods and services.

We determined the goal based on outreach for the purchases of goods and services from certified ACDBE firms and/or potential ACDBE firms in the market area. This basis is in lieu of a goal based upon a percentage of total gross receipts of car rental operations at the Airport. We will make a good faith effort to pursue opportunities to meet the goods and services goal. We will continue to consult and work with the State DOT & UCP, our car rental concessionaires at the Airport, similarly situated airports in our region, minority and women businesses in the State, minority serving institutions, local pro-business organizations, and targeted media publications to find prospective ACDBE firms. We will work with our car rental companies to strategize outreach to State DOT & UCP certified ACDBEs that may be able to provide car rental goods and services, to encourage current vendors who may be eligible for ACDBE certification to apply, and to encourage firms already working at the airport but certified as ACDBE in other states, to apply via the interstate certification process. The State DOT & UCP is

aware of this requirement and is on board to assist and process certifications as required by 49 CFR Subpart C.

We have the following car rental agencies operating at the airport: Hertz, Avis, Budget.

After collaboration and discussion with the Airport, car rental company concessionaires at the Airport stated that the goods and services they may need in the goal period are: Automobile Parts, Gasoline, Oil Change Services, Auto Detailing, Office Supplies, Auto Repair Services, Insurance Services, Tires, with estimated gross receipts of **\$4,527,504**

### **Market Area**

The market area is the geographical area in which the substantial majority of firms which seek to do concessions business with the airport are located and in which the firms which receive the substantial majority of concessions-related revenues are located.

The Bert Mooney Airport has determined that its market area is State of Montana.

There are very few certified ACDBE's in Montana that are available to provide goods and services to car rental companies.

### **Base of Goal**

To calculate the base of the goal, **Bert Mooney Airport Authority** considered the previous 3 years of rental car gross receipts and the projected potential car rental gross receipts three years into the future, including upcoming new opportunities.

#### **Gross Receipts for Previous 3 Years - Car Rental**

<b>Fiscal Year</b>	<b>Car Rental Gross Receipts</b>	<b>% Growth</b>
2018	\$1,134,860	-
2019	\$1,118,440	-1.4%
2020	\$799,010	-28.6%
2021	\$1,509,168	88.9%

The **Bert Mooney Airport Authority** estimates gross rental car receipts will remain steady (0% growth) over the next three years due to competition from other airports, and from loss of flights from the pilot shortage of their air carrier.

$\$1,509,168 + \$1,509,168 + \$1,509,168 = \$4,527,504$  is the recipient's base of the goal for car rental concessions.

The following are not included in this base: (a) non-car rental operations.

If a new 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 **Bert Mooney Airport Authority** will submit to the FAA an appropriate adjustment to the overall goal. This will be submitted to FAA for approval no later than 90 days before issuing the solicitation for the new concession opportunity. (23.45(i)).

### **Methodology used to Calculate Overall Goal**

#### **Step 1: 23.51(c)**

We determined the Step 1 base figure for relative availability of ACDBE's for goods and services related to car rentals. The based figure was calculated as follows:

Step 1 was determined by dividing the total number of ACDBE's in the market area by the total of all relative businesses in the market area. The market area was defined based on a survey sent to the existing rental car companies to determine where they spend their dollars for goods and services related to their operations at the Bert Mooney Airport. Based on the responses, the dollars spent on goods and services we all local with the Butte-Silver bow County market except for insurance which was provided by a national company. Since the Bert Mooney Airport uses Montana Department of Transportation as the DBE/ACDBE certifying agency, only those national firms that were certified by the UCP were used in the calculation.

The data source or demonstrable evidence used was the Montana State Department of Transportation DBE/ACDBE UCP and Census Bureau data.

<b>DESCRIPTION</b>	<b>NAICS CODE</b>	<b>TOTAL ESTABLISHMENTS</b>	<b>TOTAL ACDBE</b>	<b>Market Area</b>	<b>% ACDBE</b>
Locksmith	561622	19	0	Montana	-
Insurance	524210	685	1	Montana	0.146%
Promotional Products	323111	61	0	Montana	-
Auto Supplies	423120	39	1	Montana	2.56%
Gasoline	424720	10	0	Montana	-
Auto Detailing	811192	79	0	Montana	-
Auto Repair	811111	430	0	Montana	-
Automotive glass replacement shops	811122	46	0	Montana	-
Tire dealers	441320	122	0	Montana	-
Automobile Parts and accessories stores	441310	203	0	Montana	-
Automotive oil change and lubrication shops	811191	44	0	Montana	-
Car Washes	811192	79	0	Montana	-
<b>TOTAL</b>		<b>1,817</b>	<b>2</b>		<b>0.11%</b>

We divided the total ACDBE's by the Total Establishments to arrive at the base figure of  $(1 / 1,817) = 0.11\%$

**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 Step 1 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 car rental concessions is 0.11% .

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

There is no historical ACDBE data to reference to make an adjustment to the Step 1 base figure, and the ACDBE availability in the state of Montana is minimal.

Further, there are no applicable disparity studies for the local market area or recent legal case information available to show any evidence of barriers to entry or competitiveness of ACDBEs

## 1. PUBLIC PARTICIPATION

**Consultation:** Section 23.43.

### 1. §23.43 What are the consultation requirements in the development of recipients' overall goals?

(a) As a recipient, you must consult with stakeholders before submitting your overall goals to FAA.

(b) Stakeholders with whom you must consult include, but are not limited to, minority and women's business groups, community organizations, trade associations representing concessionaires currently located at the airport, as well as existing concessionaires themselves, and other officials or organizations which could be expected to have information concerning the availability of disadvantaged businesses, the effects of discrimination on opportunities for ACDBEs, and the recipient's efforts to increase participation of ACDBEs.

Prior to submitting this goal to the FAA, **Bert Mooney Airport Authority** consulted with the following stakeholders:

Hertz Rental Cars

AVIS-Budget

Registered ACDBE Companies (Goods and Services for Car Rental Operations)

No comments have been received.

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

The **Bert Mooney Airport Authority** will meet the maximum feasible portion of its overall goal by using race-neutral means of facilitating ACDBE participation. The **Bert Mooney Airport Authority** uses the following race-neutral measures.

We understand that we will be expected to actually take these steps, and this is not merely a paper exercise.

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. *Ensuring that competitors for concession opportunities are informed during pre-solicitation meetings about how the sponsor's ACDBE program will affect the procurement process;*
5. *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 0.11%, we will obtain 0.11% from race-neutral participation and 0.00% through race-conscious measures.

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. *With prior FAA approval, we will use 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.