

**Overall Goal Calculation for Concessions Other Than Car Rentals  
For FYs 2020- 2022**

**Amount of Goal**

The Lake Charles Regional Airport does not receive nor does it anticipate receiving annual revenue from concessions other than car rental during the period beginning October 1, 2019 and ending September 30, 2022, in excess of \$200,000. Consequently, no goal has been set for these concessions.



## Overall Goal Calculation for Car Rentals

### Amount of Goal

The Lake Charles Regional Airport's overall goal for car rentals during the period beginning October 1, 2019 and ending September 30, 2022, is **2.22%** of the total gross receipts of car rental operations at the Lake Charles Regional 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, Janitorial Services, and Interior Design. 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 Lake Charles Regional 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 Lake Charles Regional Airport has determined that its market area is the state of Louisiana. This is the geographical area in which the substantial majority of firms which 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

We can 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 for demonstrable evidence used to derive the denominator was the American Fact Finder website, operated by United States Census Bureau, which can be 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	1	378
561720	Janitorial	63	595
441310	Auto Parts	0	685
811120 811122	Windshield Repair	0	583
424720	Petroleum-Fuel Sales	8	59
441229	Motor Vehicle Dealers	0	47
488410	Towing	1	135
524210	Insurance Agencies and Brokerages	22	1,967
811111 811198	General Auto Repair	4	479
423420	Office Equipment/Supplies	2	108
541410	Interior Design Services	11	95
541211 541219	Accounting/Bookkeeping	22	1,374
		134	6,505

**Relative Availability**

**2.06%**



When we divided the numerator by the denominator we arrived at the base figure for our overall goal for car rental concessions of **2.06%**.

Relative Availability = 134 / 6,505

**Relative Availability = 2.06%**

**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 adjusted our base figure. Our overall adjusted goal for car rental concessions is **2.22%**.

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
2016	1.48%	0.62%
2017	1.86%	2.38%
2018	1.86%	3.23%

Median Accomplishment – **2.38%**

- 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.

Adjusted Goal = (Relative Availability + Median Accomplishment)/2  
= (2.06 + 2.38) / 2

**Adjusted Goal = 2.22%**



## **Consultation with Stakeholders (23.43)**

The 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 Southwest Louisiana 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 has afforded the Airport the opportunity to reach out to interested parties and encourage meaningful participation in its concessions program by ACDBEs. Additionally, the Airport makes copies of its ACDBE Program available to each of these organizations for distribution to its members.

During the development of this program, the Lake Charles Regional Airport sought out input and comments from the agencies identified in the previous paragraph. No comments were received. 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 Lake Charles 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, 2019 and ending September 30, 2022, at which time the goals will be updated. The Airport has set a goal of **2.22%** 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, from July 15, 2019 to August 14, 2019, in the offices of the Executive Director, 300 Airport Service Road, Lake Charles, Louisiana 70605.

Comments on the ACDBE goals can be sent to either of the following addresses:

Mr. Heath Allen, CM  
Executive Director  
Lake Charles Regional Airport  
P.O. Box 5820  
Lake Charles, LA 70606

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

## PUBLIC COMMENTS

If any public comments are received, we will notify the FAA's Office of Civil Rights.



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

The Lake Charles Regional Airport will meet the maximum feasible portion of its overall goal by using race-neutral means of facilitating ACDBE participation. The Lake Charles Regional Airport 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 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.*

We estimate that, in meeting our overall goal of **2.22%**, we will obtain **0.52%** from race-neutral participation and **1.70%** 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. *Over the last three years, the Lake Charles Regional Airport has been increasing the amount of its ACDBE participation, with a median accomplishment of **2.38%** for an established goal of 1.86%. This results in 0.52% of race-neutral accomplishments;*
2. *ACDBE participation on concession leases has occurred on each of our Rental Car Agreements that do not have ACDBE requirements;*
3. *Through consultation with our ACDBE stakeholders, we have encouraged success in our program and will continue to urge participation.*



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 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.

