



COLUMBUS
REGIONAL AIRPORT AUTHORITY

AIRPORT CONCESSIONS DISADVANTAGED BUSINESS ENTERPRISE (ACDBE) PROGRAM

Non-Car Rental GOAL SETTING METHODOLOGY

FFY 2024-2025-2026
49 CFR Part 23



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John Glenn Columbus International Airport

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FFY 2024-2025-2026 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 2024-2026 of 18.31%, which is applicable to non-car rental concessions contracting opportunities at John Glenn Columbus 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 has determined that the market area it draws from for concessions is the State of Ohio. This is the geographical area in which most of the firms that seek to do concession business with the airport are located and 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

The Authority may meet the percentage goal by including the purchase from ACDBEs of goods and services used in businesses conducted at the airport. Businesses at the airport and the authority, 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. The businesses at the airport and the Authority, 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. See table on pages 8 and 9 for the detail on how the base of the goal was calculated.

Base of goal = Avg. 3-yr Projected Concession Revenue (FFY 2024-2026) = **\$55,952,252**

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

Work Area	NAICS Code	# of ACDBE/ DBE Firms (OH)	# of Firms in Market Area (OH)	% of ACDBE Firms that may be available
Electronics Stores	443142	0	641	0.0%
Baked Goods Stores/All Other Specialty Food Stores	445291/445299	1	135	0.7%
Family Clothing/Jewelry Stores/Luggage & Leather Goods	448140/448310/48320	0	744	0.0%
News Dealers & Newsstands	451212	1	27	3.7%
Gifts, Novelty, All Other General Merchandise	452990/455219/453220	3	550	0.5%
Vending Machine Operators	454210	1	137	0.7%
Transit & Ground Passenger Transportation	485113/485999	7	48	14.6%
Other Airport Operations	488119	0	48	0.0%
Commodity Contracts Dealing (foreign exchange)	523130/523160/523120	0	784	0.0%
Advertising	541810/541850	12	444	2.7%
Hotel	721	0	1,797	0.0%
Food / Beverage	722	10	23,022	0.0%
Personal Care Services	812199/812990	4	713	0.6%
TOTAL		39	29,090	
Percentage of ACDBE Firms of All Firms			0.1%	

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 18, 2023. 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 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.

$$\text{Base figure} = \frac{39}{29090} = 0.1\%$$

When we divided the numerator by the denominator, we arrived at the base figure for our overall goal for non-car rental concessions of 0.1%.

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 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, the authority has adjusted our base figure by +18.21%. Our overall goal for non-car rental concessions is 18.31%. This number is based upon recent ACDBE attainment(s).

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, we also looked at other minority owned firms within the market area that are not ACDBE certified. The Authority also regularly engages in 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

To determine if our overall goal for non-car rental concessions should be adjusted, we looked at past participation in concessions at John Glenn Columbus International Airport (CMH) for the past 3 years.

Fiscal Year	Past Performance
2021	13.89%
2022	20.05%
2023	18.31%
Average	18.09%
Median	18.31%

The Authority also reviewed projected ACDBE participation based on estimated gross receipts for 2024-2026. See **Exhibit 1**.

Utilizing data based on past performance and anticipated ACDBE participation in Federal Fiscal Years 2024-2026, the projected ACDBE participation in fiscal year 2024-2026 in airport concessions, the John Glenn Columbus International Airport estimates an average of \$11,570,416.21 or 18.31% of total gross receipts.

FFY 2024-2026

$$\frac{\text{Average Projected ACDBE Concession Gross Receipts}}{\text{Average of All Projected Concession Gross Receipts}} = \frac{\$11,570,416.21}{\$63,202,507.56} = 18.31\%$$

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, 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 regarding the ACDBE program and goals.

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 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 18.31%, we will obtain 1.0% from race-neutral participation and 17.31% 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 JOHN
GLENN COLUMBUS INTERNATIONAL AIRPORT**

<i>Column1</i>	<i>FFY</i>	<i>FFY 2</i>	<i>FFY 3</i>	<i>Average</i>
<i>NON - CAR RENTAL CONCESSIONS</i>	<i>FFY2021</i>	<i>FFY2022</i>	<i>FFY2023</i>	<i>2021-2023*</i>
Advertising	1,152,062.23	1,589,339.62	2,078,750.28	1,608,050.71
Baggage Carts	132,642.87	190,806.49	196,940.74	173,463.37
Food & Beverage with 0% DBE Partner	5,899,824.84	\$ 1,478,339.27	1,409,505.70	2,929,223.27
Food & Beverage with 15% DBE Partner		\$ 12,508,412.34	17,541,494.73	15,024,953.54
Food & Beverage with 20% DBE Partner		\$ 708,963.21	1,079,659.50	894,311.36
Charley's DBE food vendor (100% DBE)	408,953.74	461,168.97	470,585.80	446,902.84
Donatos - C Concourse (100% DBE)	691,292.54	870,746.35	926,170.83	829,403.24
Donato's*** (100% DBE)	1,069,897.26	1,757,565.11	2,197,318.87	1,674,927.08
Lottery (100% DBE)	631,344.00	702,733.00	359,967.80	564,681.60
Hotel	3,249,401.44	7,050,062.00	7,284,540.00	5,861,334.48
Check Point Mailers	11,974.95	17,586.05	16,081.85	15,214.28
Alclear dba CLEAR	-	1,887,534.86	3,782,827.68	1,890,120.85
VDV Concessions Eddie George - 20 % DBE	2,419,600.45	3,420,110.97	3,392,611.98	3,077,441.13
Retail ** (15% DBE in 21 and first half of 22)	5,963,795.56	4,351,502.27		5,157,648.92
Retail ** (20% DBE in 22 & 23)		5,277,518.87	10,632,366.04	7,954,942.46
Zoom Shops	21,032.33	-	-	7,010.78
ATM Machines	47,846.14	70,308.29	69,733.81	62,629.41
FuelRod	19,097.26	32,892.69	30,613.14	27,534.36
Vending (non-DBE)	556,658.09	982,686.47	918,269.06	819,204.54
Misc Non DBE	772,842			257,614
Misc DBE	317,229			105,743

Lounge			1,397,686.47	1,397,686.47
Host Vending & Vendop - 100% DBE	182,160.00	218,448.18	294,016.00	231,541.39
TOTAL	\$23,230,426	\$43,580,285	\$54,079,140	\$40,269,763.66
Actual/Projected ACDBE Participation	\$3,225,641	\$8,738,169	\$9,900,211	\$7,288,016.13
ACDBE Participation %	13.89%	20.05%	18.31%	18.09%
Column1	FFY	FFY4	FFY5	Average2
NON - CAR RENTAL CONCESSIONS	FFY2024*	FFY2025*	FFY2026*	2024-2026*
Advertising	2,043,436.67	2,206,911.60	2,383,464.53	\$ 2,211,270.93
Baggage Carts	197,417.48	213,210.87	230,267.74	213,632.03
Food & Beverage with 0% DBE Partner	1,522,266.16	1,644,047.45	1,775,571.24	\$ 1,647,294.95
Food & Beverage with 15% DBE Partner	18,944,814.31	20,460,399.45	22,097,231.41	\$ 20,500,815.06
Food & Beverage with 20% DBE Partner	1,166,032.26	1,259,314.84	1,360,060.03	\$ 1,261,802.38
Charley's DBE food vendor (100% DBE)	508,232.66	548,891.28	592,802.58	\$ 549,975.51
Donatos - C Concourse (100% DBE)	1,000,264.50	1,080,285.66	1,166,708.51	\$ 1,082,419.55
Donato's*** (100% DBE)	2,373,104.38	2,562,952.73	2,767,988.95	\$ 2,568,015.35
Lottery	388,765.22	419,866.44	453,455.76	\$ 420,695.81
Hotel	7,867,303.20	8,496,687.46	9,176,422.45	8,513,471.04
Check Point Mailers	17,368.40	18,757.87	20,258.50	\$ 18,794.92
Alclear dba CLEAR	4,085,453.89	4,412,290.21	4,765,273.42	\$ 4,421,005.84
VDV Concessions Eddie George - 20 % DBE	3,664,020.94	3,957,142.61	4,273,714.02	\$ 3,964,959.19
Retail ** (15% DBE in 21 and first half of 22)	-	-	-	\$ -

Retail ** (20% DBE in 22 & 23)	11,482,955.32	12,401,591.75	13,393,719.09	\$ 12,426,088.72
Zoom Shops	-	-	-	\$ -
ATM Machines	75,312.51	81,337.52	87,844.52	\$ 81,498.18
FuelRod	33,062.19	35,707.17	38,563.74	\$ 35,777.70
Vending (non-DBE)	991,730.58	1,071,069.03	1,156,754.55	\$ 1,073,184.72
Lounge	1,509,501.39	1,630,261.50	1,760,682.42	\$ 1,633,481.77
Host Vending & Vendop - 100% DBE	317,537.28	342,940.26	370,375.48	\$ 343,617.68
TOTAL	58,405,471.50	63,077,909.22	68,124,141.96	\$ 63,202,507.56
Actual/Projected ACDBE Participation	10,692,227.89	11,547,606.13	12,471,414.62	\$ 11,570,416.21
ACDBE Participation %	18.31%	18.31%	18.31%	18.31%