

Alaska Department of Transportation & Public Facilities Airport Concessionaire Disadvantaged Business Enterprise Goal Methodology

> Fairbanks International Airport FFY 2025 - 2027

# PROPOSED ACDBE OVERALL CONCESSION GOALS

# Federal Fiscal Years 2025 - 2027 Fairbanks International Airport

Airport Sponsor:	Alaska DOT&PF
Airport:	Fairbanks International Airport

Goal Period:

From: October 1, 2024 Thru: September 30, 2027

ACDBE Goal for Non-Car Rental Concessions:

18.8% (Race Neutral)

ACDBE Goal for Car Rental Concessions:

0.7% (Race Neutral)

# Section 23.45: Separate Overall Goal Calculation

# for Non-Car Rental Concessions

As a Federal Aviation Administration (FAA) grant recipient, the Alaska Department of Transportation & Public Facilities (Alaska DOT&PF) must establish two separate overall Airport Concessionaire Disadvantaged Business Enterprise (ACDBE) goals for applicable airports. The first goal is for non-car rental concessions; the second is for car rental concessions. Applicable airports are primary airports that meet the criteria set forth under 49 CFR Part 23.41(b).

Fairbanks International Airport (FAI) is a small hub, primary airport that meets the criteria set forth in 49 CFR Part 23.41(b), and therefore Alaska DOT&PF is required to establish overall ACDBE goals for FAI. This document establishes Alaska DOT&PFs overall ACDBE goals for FAI, effective for the federal fiscal years FFY 2025-2027.

Alaska DOT&PF, in accordance with 49 CFR Part 23.51, used the following process to establish overall ACDBE goals for concessions at FAI:

- 1. Establish the relevant market area.
- 2. Calculate the base in accordance with 49 CFR Part 23.47 and 49 CFR Part 23.49.
- 3. Determine a base figure for the relative availability of ACDBEs.
- 4. Examine all relevant evidence reasonably available to determine what adjustments, if any, are needed to the base figure.
- 5. Determine the race-conscious/race-neutral split for the proposed ACDBE goals.
- 6. Consult with Stakeholders

### Section 23.45: Overall Goal Calculating for Non-Car Rentals

Overall Goal: 18.4%, to be accomplished through 0.00% race conscious and 18.4% race neutral.

### Methodology used to calculate Overall Goal

### Relevant Market Area: Section 23.51(b)(3)

The Alaska DOT&PF has determined the market area is as follows: The state of Alaska (S) for certain categories as shown below and Nationwide (N) for certain categories as shown below.

NAICS Code	Type of Goods & Services	Market Area
459210, 459420	Gift Shop/News	N
454210 (445132 on AK AUCP Directory)	Vending Machine	S
522320	ATM Machine	S
541850	Advertising	N
722	Food/Beverage	N
812930	Parking/Baggage Cart	N

# Base of Non-Car Rental ACDBE Goal:

To calculate the base of the goal, Alaska DOT&PF considered the previous three years of gross concession receipts and the projected potential concession revenue (gross receipts) three years into the future including upcoming new opportunities. The following table presents gross receipts for FFY2021-2023 and projected gross receipts for FFY2024-2027. Projections are based on trends in non-car rental concessions at FAI, and an annual enplanement growth rate of 5.00%.

Fiscal Year	Non-Car Rental Concessions Revenue	Annual Enplanement Growth Rate of 5.00%	Projected Non-Car Rental Concessions Revenue
FFY2021	\$5,813,549		
FFY2022	\$8,349,872		
FFY2023	\$9,529,478		
FFY2024		\$9,529,478*1.05 =	\$10,005,952
FFY2025		\$10,005,952*1.05 =	\$10,506,249
FFY2026		\$10,506,249*1.05 =	\$11,031,562
FFY2027		\$11,031,562*1.05 =	\$11,583,140

\$10,506,249 + \$11,031,562 + \$11,583,140 = **\$33,120,952** is FAI's dollar base for the non-car rental concession goal.

### Step 1 Base Figure for Non-Car Rental Concessions: Section 23.51(c)

We determined the base figure for the relative availability of ACDBEs for non-car rental concessions.

Numerator: Ready, willing, and able non-car rental ACDBEs in the market area. The data source or demonstratable evidence used was:

- The Alaska Unified Certification Program (AUCP) DBE Directory: The AUCP DBE Directory contains detailed information on certified ACDBEs including ethnicity information and NAICS certifications: <u>https://dot.alaska.gov/cvlrts/directory.shtml</u> (For concessions using a statewide geographic market)
- FAA DBE System Directory: The FAA DBE System DBE/ACDBE Directory is a nationwide list of certified DBE/ACDBEs: <u>https://faa.dbesystem.com/</u> (For concessions using a nationwide geographic market)

Denominator: All ready, willing, and able non-car rental concessions firms in the market area. The data source or demonstratable evidence used was:

• 2022 Census Bureau Data: The Census Bureau's County Business Pattern (CBP) database contains data regarding available firms by location and NAICS codes: <u>https://data.census.gov/</u>

NAICS Code	NAICS Description	ACBDEs	All Firms	%
459210; 459420	Book Retailers and News Dealers; Gift,	441	19,982	2.2%
	Novelty, and Souvenir Retailers			
454210 (445132 on	Vending Machine Operators	1	5	20.0%
AK AUCP Directory)				
522320	Financial Transactions Processing,	0	6	0.0%
	Reserve, and Clearinghouse Activities			
541850	Indoor and Outdoor Display Advertising	216	2549	8.5%
722	Food/Beverage Services	1,420	700,469	0.2%
812930; 488119	Parking Lots and Garages/Baggage	196	14,133	1.4%
	Carts			
Total		1,833	717,162	0.3%

### Weighting

Weighting the concession categories based on gross revenue results in the following:

NAICS Code	NAICS Description	% Gross	%	Weighted
			Availability	%
459210; 459420	Book Retailers and News Dealers; Gift, Novelty, and Souvenir Retailers	37.90%	2.20%	0.83%
454210 (445132 on AK AUCP Directory)	Vending Machine Operators	1.00%	20.00%	0.20%
522320	Financial Transactions Processing, Reserve, and Clearinghouse Activities	0.10%	0.00%	0.00%
541850	Indoor and Outdoor Display Advertising	3.20%	8.50%	0.27%
722	Food/Beverage Services	25.10%	0.20%	0.05%
812930; 488119	Parking Lots and Garages/Baggage Carts	32.70%	1.40%	0.46%
Total		100.0%		1.81%

# Step one of the goal-setting process yielded a base figure for the relative availability of non-car rental ACDBEs of 1.8%.

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.

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 FAI 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))

# 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.

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

# **Past History Participation**

Data used to determine the adjustment to the base figure was the median of historical ACDBE accomplishments at FAI for the previous two goa cycles.

Fiscal Year	Non-Car Rental ACDBE Concessions Revenue	ACDBE Participation (%)
FFY2018	\$2,068,256	30.34%
FFY2019	\$2,283,957	31.47%
FFY2020	\$1,432,813	33.50%
FFY2021	\$2,540,853	43.71%
FFY2022	\$3,512,670	42.07%
FFY2023	\$3,607,527	37.86%

Arranging this historical data from low to high, 30.34%, 31.47%, 33.50%, 37.86%, 42.07%, and 43.71%, **the median is 35.7%**.

To arrive at an overall goal, we added our Step 1 base figure with our Step 2 adjustment figure and then averaged the total arriving at an overall goal of 18.0%.

Step 1: 1.8% plus Step 2: 37.5% = 37.5% divided by 2 = **18.8% for the overall goal**.

We feel this adjusted goal figure will accurately reflect ACDBE non-car rental concession participation that can be achieved during this period. There are no applicable disparity studies for the local market area or recent legal case information available that provide for additional adjustments.

### **Race-Neutral/Race-Conscious**

The goal has been set as 100% race-neutral as the ACDBE Goal has been exceeded for the past 5 years using race neutral methods.

# **Consultation:**

The goal setting process used by Alaska DOT&PF to establish the annual overall goal submitted to the operating administration for approval includes consultation with minority, women's and ACDBE community organizations, and other officials or organizations which could be expected to have information concerning the availability of ACDBEs and non-ACDBEs. This consultation process is also

intended to gather information concerning the effects of discrimination on opportunities for ACDBEs and establishing a level playing field for the participation of ACDBEs. The Alaska DOT&PF held a stakeholder meeting on November 6, 2024. Emails were sent to over 500 stakeholders notifying them of the meeting and inviting participation. In addition, a notice was posted on the Alaska DOT&PF website. Sixteen people registered for the meeting, thirteen of which are employees of Alaska DOT. Three non-Alaska DOT employee stakeholders registered for and attended the meeting. A copy of the attendance list is also found below. One attendee expressed an opinion that vehicle purchases should not be included in the base for car rental ACDBE participation. We noted that FAA has expressed that vehicle purchase should be included. There were no other comments. A copy of the flyer that was posted on the website and emailed to over 500 stakeholders is shown below.

> CAUTION: This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.



Department of Transportation & Public Facilities (Alaska DOT&PF) invites public participation in the Federal Aviation Administration (FAA) Airport Concession Disadvantaged Business Enterprise (ACDBE) Goal Methodology for Federal Fiscal Years (FFY) 2025-2027. This three-year Goal Methodology pertains to the Fairbanks International Airport (FAI) at 6450 Airport Way, Fairbanks, AK 99709

- · The purpose of this Public Participation Stakeholders Consultation Meeting is to educate stakeholders about the goal-setting process, good faith efforts, reporting, and compliance. We encourage stakeholders to share any barriers to participating in federally funded projects, the impact of discrimination on opportunities for ACDBE firms, and suggestions for increasing opportunities for all firms, including ACDBE firms.
- The objective of this meeting is to engage with minority and women's groups, community organizations, trade associations, concessionaires, and other relevant officials or organizations that may have valuable information concerning the availability of disadvantaged businesses.

The Alaska DOT&PF, Civil Rights Office invites all interested parties to participate in this important consultation to discuss the ACDBE goal and methodology and to provide feedback and insights.



Join us for the Public Stakeholder Consultation meeting:

- Date: Wednesday, 11/06/2024
- Time: 10:00 AM 11:00 AM AKST



During this meeting you are able to make comments and ask questions.

#### Can't join us but still want to submit a comment?

- · Email comments to dbegoalmethodology@alaska.gov Submit comments via Fax at 907-269-0847
- · Mail comments to:

Alaska DOT&PF, ATTN: Civil Rights Office 2200 E 42nd Ave, Anchorage, AK 99508/P.O. Box 196900, Anchorage, AK 99519-6900

Public Comment Form - Comments due 11/08/24



# **Stakeholder Meeting – List of Attendees**

First Name	Last Name	Email	Organization
Richard	Ackerman	richard.ackerman@alaska.gov	State of Alaska - Fairbanks International Airport
Brittney	Hoffert	brittney.hoffert@alaska.gov	DOT&PF, Civil Rights Office
Robert	Hunsinger	robert.l.hunsinger@em.com	Enterprise Mobility
Irving	Brown	irvinglbsr@gmail.com	Northwest Small Business Transportation Resource Center
Christel	Burgess	christel.burgess@alaska.gov	State of Alaska - Fairbanks International Airport
Phil	Adams	<u>phil.adams@alaska.gov</u>	FAI
Amanda	Stonecipher	amanda.stonecipher@alaska.gov	State of Alaska - Fairbanks International Airport
Isela	Toledo	isela.toledo@hudsongroup.com	Hudson
Frank	Keirn	frank.keirn@alaska.gov	DOT&PF, Civil Rights Office
natalia	fricke	natalia.fricke@alaska.gov	DOT&PF, Civil Rights Office
Cindy	Olivares	colivares@acc-consulting-llc.com	Consultant
Rebecca	Poulsen	becky@twigsgifts.com	Twigs Alaskan Gifts
Rashaud	Joseph	rashaud.joseph@alaska.gov	DOT&PF, Civil Rights Office
Ann	Pham	ann.pham@alaska.gov	DOT&PF, Civil Rights Office
Angelo	Tutaan	angelo.tutaan@alaska.gov	DOT&PF, Civil Rights Office
Sarah	Starzec	sarah.starzec@alaska.gov	DOT&PF, Civil Rights Office
Zhenia	Peterson	zhenia.peterson@alaska.gov	DOT&PF, Civil Rights Office

# Section 23.45: Overall Goal Calculation for Car Rentals

# **Overall Three-Year Goal:** 0.7% to be accomplished through 0.00% RC and 0.7% RN

The Alaska DOT&PF has determined the market area is as follows: The state of Alaska (S), the Fairbanks North Star Borough (B) in Alaska, as well as the Nationwide (N) market area.

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

Market Area: The market area was determined utilizing the following information.

# Figure 6

NAICS CODE	Type of Goods and	Market Area
	Services	
459410/453210	Office Supplies	N
237310	Parking Lot Striping	S
423130	Tire Wholesaler	В
423850	Cleaning Supplies	S
423990	Durable Goods	N
424720	Fuel Dealers	В
441110	New Car Dealership	N
441310	Auto Parts Supplies	S
488410	Towing	В
517311	Phone System	S
524210	Insurance	N
541211	Accounting	N
541810	Advertising Agency	N
561439	Printing	В
561621	Alarm System	S
561622	Locksmith	В
561720	Janitorial Services	В
811111	General Auto Repair	В
811121	Auto Body Repair	В
811122	Auto Glass	В
811191	Oil Change	В
811192	Car Wash/Detail	В
811212	Computer/office	В
	Repair	

\*N=National; S= State; B=Fairbanks North Star Borough

### Methodology used to Calculate Overall Goal

### Goods and Services

As there are no ACDBE car rental concessions in the market area, we have calculated0301 the ACDBE goal by including the purchases from ACDBEs of goods and services used in business conducted at the airport by the car rental agencies. The goal will be developed by considering the ACDBE goods and services opportunity dollar value from purchases of goods and services from ACDBEs as the numerator, and the dollar value from purchases of goods and services from all firms (ACDBEs and non-ACDBEs) as the denominator.

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

Upon review of the market, it appears that the goal is likely to be met through the purchases by car rental companies of vehicles or other goods/services from ACDBEs. This is due to the fact that no certified

ACDBE car rental companies exist within the market. As such, the Alaska DOT&PF 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 Alaska DOT & PF and 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 probusiness organizations, and targeted media publications to find prospective ACDBE firms. We will work with our car rental companies to strategize outreach to Alaska DOT & PF and 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 Alaska DOT&PF and the AUCP 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: Alaska Rent-A-Car, Copper River Rentals, EAN Holdings, LLC, Hertz Corporation and Rental Services, LLC.

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: Office Supplies, Parking Lot Striping, Tire Wholesaler, Cleaning Supplies, Durable Goods, Fuel Dealers, New Car Dealership, Auto Parts Supplies, Towing, Phone System, Insurance, Accounting, Advertising Agency, Printing, Alarm System, Locksmith, Janitorial Services, General Auto Repair, Auto Body Repair, Auto Glass, Oil Change, Car Wash/Detail, and Computer/office Repair with estimated gross purchases of \$4,151,604 annually.

# **Base of Car Rental Goal**

### Step 1: 23.51(c)

We determined the base figure for the relative availability of goods and services. The base figure was calculated as follows:

Numerator: Ready, willing, and able relevant goods and services ACDBE firms in the market area

Denominator: All ready, willing, and able relevant goods and services firms in the market area

The data source or demonstrable evidence used was:

- Alaska Unified Certifications Program (AUCP) DBE Directory: The AUCP DBE Directory contains detailed information on certified ACDBEs including ethnicity information and NAICS certifications. <u>https://dot.alaska.gov/cvlrts/directory.shtml</u>
- National Certified Directory: The FAA National DBE/ACDBE Directory is a nationwide list of certified Disadvantaged Business Enterprises (DBE) and Airport Concession Disadvantaged Business Enterprises (ACDBE). <u>https://faa.dbesystem.com/</u>
- Census Bureau Data: The Census Bureau's County Business Pattern (CBP) database contains data regarding available firms by location and NAICS code. <u>https://data.census.gov/</u>

NAICS CODE	Type of Goods and Services	Total ACDBE's	<b>Total All Firms</b>	%
423130	Tire Wholesaler	0	9	0.00%
424720	Fuel Dealers	0	3	0.00%
488410	Towing	0	19	0.00%
561439	Printing	0	12	0.00%
561622	Locksmith	0	7	0.00%
561720	Janitorial Services	1	32	3.13%
811111	General Auto Repair	0	35	0.00%
811121	Auto Body Repair	0	10	0.00%
811122	Auto Glass	0	5	0.00%
811191	Oil Change	0	3	0.00%
811192	Car Wash/Detail	0	4	0.00%
811212	Computer/office Repair	0	19	0.00%
Total Borough		1	158	0.63%
423850	Cleaning Supplies	0	9	0.00%
441310	441310 Auto Parts Supplies		104	0.00%
517311	517311 Phone System		17	5.88%
561621 Alarm System		1	13	7.69%
Total State		2	143	1.40%
459410/453210	Office Supplies	32	4,475	0.72%
423990	Durable Goods	378	9,645	3.92%
441110	New Car Dealership	7	21,622	0.03%
524210			135,939	0.18%
541211	541211 Accounting		55,346	0.59%
541810 Advertising Agency		659	14,612	4.51%
Total National		1,654	241,639	0.68%
Total		1,657	241,940	0.68%

Base 0.7%

The Alaska DOT&PF does not anticipate any major changes that would increase goods and services opportunities over the next year. Progress will be checked annually.

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 Alaska DOT&PF 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)).

# Step 2: 23.51 (d)

Past History Participation

We do not have a history of accomplishments to use for a Step 2 adjustment. Also, we do not have an applicable disparity study or any other statistically reliable evidence to use to adjust the goal. Therefore,

we do not believe a Step 2 Adjustment can be made based on demonstrable evidence. We are adopting our Step 1 goal of 0.7% with plans to conduct informational meetings and outreach to car rental and ACDBE firms. We also plan to outreach to minority and small business firms who may be potential ACDBE firms in an effort to ensure fair opportunities for all. We will be conducting outreach jointly with our car rental agencies to ensure that earnest efforts are made to meet the goal.

### Consultation: Section 23.43

The goal setting process used by Alaska DOT&PF to establish the annual overall goal submitted to the operating administration for approval includes consultation with minority, women's and ACDBE community organizations, and other officials or organizations which could be expected to have information concerning the availability of ACDBEs and non-ACDBEs. This consultation process is also intended to gather information concerning the effects of discrimination on opportunities for ACDBEs and establishing a level playing field for the participation of ACDBEs. The Alaska DOT&PF held a stakeholder meeting on November 6, 2024. Emails were sent to over 500 stakeholders notifying them of the meeting and inviting participation. In addition, a notice was posted on the Alaska DOT&PF website. Sixteen people registered for the meeting, thirteen of which are employees of Alaska DOT. Of the three non-employee stakeholders, 17 attended the meeting. One attendee expressed an opinion that vehicle purchases should not be included in the base for car rental ACDBE participation. We noted that FAA has expressed that vehicle purchase should be included. There were no other comments. A copy of the flyer that was posted on the website and emailed to over 500 stakeholders is shown below.

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In accordance with <u>49 CFR Part 23</u>, <u>Section 23.43</u>, the Civil Rights Office (CRO) of the State of Alaska Department of Transportation & Public Facilities (Alaska DOT&PF) **invites public participation** in the Federal Aviation Administration (FAA) **Airport Concession Disadvantaged Business Enterprise (ACDBE) Goal Methodology for Federal Fiscal Years (FFY) 2025-2027**. This three-year Goal Methodology pertains to the **Fairbanks International Airport (FAI)** at 6450 Airport Way, Fairbanks, AK 99709.

- The purpose of this Public Participation Stakeholders Consultation Meeting is to educate stakeholders about the goal-setting process, good faith efforts, reporting, and compliance. We encourage stakeholders to share any barriers to participating in federally funded projects, the impact of discrimination on opportunities for ACDBE firms, and suggestions for increasing opportunities for all firms, including ACDBE firms.
- The objective of this meeting is to engage with minority and women's groups, community
  organizations, trade associations, concessionaires, and other relevant officials or organizations
  that may have valuable information concerning the availability of disadvantaged businesses.

The Alaska DOT&PF, Civil Rights Office invites all interested parties to participate in this important consultation to discuss the <u>ACDBE goal and methodology</u> and to provide feedback and insights.

Join us for the Public Stakeholder Consultation meeting:



- Date: Wednesday, 11/06/2024
- Time: 10:00 AM 11:00 AM AKST
- Registration: Zoom Link

During this meeting you are able to make comments and ask questions.

#### Can't join us but still want to submit a comment?

Email comments to dbegoalmethodology@alaska.gov
 Submit comments via Fax at 907-269-0847

· Mail comments to:

Alaska DOT&PF, ATTN: Civil Rights Office 2200 E 42nd Ave, Anchorage, AK 99508/P.O. Box 196900, Anchorage, AK 99519-6900

Public Comment Form - Comments due 11/08/24



# **Stakeholder Meeting – List of Attendees**

First Name	Last Name	Email	Organization
Richard	Ackerman	richard.ackerman@alaska.gov	State of Alaska - Fairbanks International Airport
Brittney	Hoffert	brittney.hoffert@alaska.gov	DOT&PF, Civil Rights Office
Robert	Hunsinger	robert.l.hunsinger@em.com	Enterprise Mobility
Irving	Brown	irvinglbsr@gmail.com	Northwest Small Business Transportation Resource Center
Christel	Burgess	christel.burgess@alaska.gov	State of Alaska - Fairbanks International Airport
Phil	Adams	phil.adams@alaska.gov	State of Alaska - Fairbanks International Airport
Amanda	Stonecipher	amanda.stonecipher@alaska.gov	State of Alaska - Fairbanks International Airport
Isela	Toledo	isela.toledo@hudsongroup.com	Hudson
Frank	Keirn	frank.keirn@alaska.gov	DOT&PF, Civil Rights Office
natalia	fricke	natalia.fricke@alaska.gov	DOT&PF, Civil Rights Office
Cindy	Olivares	colivares@acc-consulting-llc.com	Consultant
Rebecca	Poulsen	becky@twigsgifts.com	Twigs Alaskan Gifts
Rashaud	Joseph	rashaud.joseph@alaska.gov	DOT&PF, Civil Rights Office
Ann	Pham	ann.pham@alaska.gov	DOT&PF, Civil Rights Office
Angelo	Tutaan	angelo.tutaan@alaska.gov	DOT&PF, Civil Rights Office
Sarah	Starzec	sarah.starzec@alaska.gov	DOT&PF, Civil Rights Office
Zhenia	Peterson	Zhenia.peterson@alaska.gov	DOT&PF, Civil Rights Office