



Alaska Department of Transportation
& Public Facilities

Airport Concession Disadvantaged Business
Enterprise (“ACDBE”) Goal Methodology

Ted Stevens Anchorage International Airport
FFY 2025 - 2026

PROPOSED ACDBE OVERALL CONCESSION GOALS
Federal Fiscal Years 2025 - 2026
Ted Stevens Anchorage International Airport
Anchorage, AK

Airport Sponsor: State of Alaska
Airport: Ted Stevens Anchorage International Airport
Goal Period: From: October 1, 2024
Thru: September 30, 2026

ACDBE Goal for Non-Car Rental Concessions: 8.0% (Race Neutral)

ACDBE Goal for Car Rental Concessions: 0.7% (Race Neutral)

**Section 23.45: Separate Overall Goal Calculation
for Non-Car Rental Concessions**

Amount of Goal

Ted Stevens Anchorage International Airport's (the "Airport" or "ANC") overall goal for concessions other than car rental during the period beginning October 1, 2024 and ending September 30, 2026 is 8.0%. The goal is expressed as a percentage of the total estimated gross receipts for concessions at the 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 Airport determines the market area for each concession opportunity as it arises. The market area is defined as the geographical area in which the substantial majority of firms which seek to do the specific 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.

The calculation for determining the overall goal for the three-year period is as follows:

Federal Fiscal Years 2025 – 2026

Total estimated gross receipts for all concessions excluding car rentals = \$127,826,341
Estimated ACDBE gross receipts = \$10,226,107
 $\$10,226,107 / \$127,826,341 = 8.0\%$

Methodology used to Calculate Overall Goal

Overall goals have been determined by consolidating the total estimated gross revenues and estimated ACDBE gross revenues for continuing and anticipated new concession agreements that will become effective during the goal period. Goals for each new concession are determined through an analysis of the opportunity, potential for ACDBE participation and the relative availability of ACDBE firms who are ready, willing, and able to perform under the agreement.

In accordance with 49 CFR part 23.51(c) ACDBE goals for specific opportunities are determined as follows:

Step 1: 23.51(c)

The Airport determines the base figure for the relative availability of ACDBEs for the specific opportunity. The base figure may be calculated in a number of ways, depending upon what is most appropriate for the specific opportunity.

Examples are as follows:

Option 1: Ready, willing, and able ACDBEs in the appropriate trade in the determined market area ÷ All ready, willing and able companies in the appropriate trade in the determined market area.

The data source or demonstrable evidence used to derive the numerator may be either the DBE/ACDBE directory (23.51(c)(1)) or an active participant list (23.51(c)(2)).

If the Airport uses ACDBE directories, which directories and which NAICS codes were used will be identified. The Airport may also augment available ACDBEs with firms in local MBE/WBE directories or trade association lists. If the Airport uses these sources to augment the numerator, the sources used and the number of firms added to the numerator will be identified.

If the Airport uses an Active Participant List, where the information was obtained will be identified. Such information may come from past experience with firms that have run concessions or sought concession contracts or leases, knowledge about the universe of firms in certain concession services that tend to be interested in participating, and attendance lists from informational and outreach meetings about upcoming concession opportunities.

Option 2: Disparity Study -There are no relevant disparity studies from the Airport's geographic area at this time. The Alaska Department of Transportation and Public Facilities is currently undertaking a Disparity Study. If the results become available before the end of this goal period an appropriate adjustment will be made if warranted.

Option 3: Goal of another sponsor – The Airport may use the goal of another airport or DOT sponsor in the same, or substantially similar market if their overall goal is in compliance with 49 CFR part 23. Should the Airport elect to do so, the Airport will include information as to why our airport concession opportunity has the same or substantially similar market. There are currently no similar facilities in the relevant geographic region.

Option 4: Alternative Methods – The Airport may elect to use other methods to determine the base figure, however it must be based on demonstrable evidence of local market conditions and be designed to arrive at a goal that is rationally related to the relative availability of ACDBEs in the market area.

Step 2: 23.51(d)

After calculating a base figure of the relative availability of ACDBEs, the Airport will examine evidence to determine what adjustment, if any, is needed to the base figure in order to arrive at the overall goal.

In accordance with 23.51(d), any adjustment will be designed to reflect as accurately as possible the ACDBE participation the Airport would expect in the absence of discrimination. In addition, the Airport will document the basis on which the base figure was adjusted using the specific data.

Ted Stevens Anchorage International Airport Non-Rental Car Concessions

ANC ACDBE Goals for federal fiscal years 2025 – 2026 have been set for each concession contract as listed below and shown on the following chart. It should be noted that approximately 91.6% of the in-terminal non-car rental concession revenue will be generated by food/beverage and retail concessions. All other in-terminal non-car rental concessions combined generate less than 8.4% of the total in-terminal revenue.

Food/Beverage - The food/beverage contract is operated by 6 individual operators. None of the food/beverage contracts will be expiring during this goal period. There are no contract goals in the agreements, however the largest food/beverage contract currently has ACDBE participation through a joint venture with an ACDBE and one sublease to an ACDBE resulting in overall ACDBE participation of 10.5% for the food/beverage category. Two new food/beverage operations were recently awarded. Projected sales for this operation are included in the food/beverage sales projections. This operation does not include ACDBE participation. Adding these operations to the food/beverage gross revenues reduces projected participation from 10.5% to 9.8%. We assume this will continue throughout the two-year goal period.

News/Gift - The News/Gift contract, currently operated by one operator and will expire on September 30, 2025 but will be held over pending the development of the concession plan. A goal analysis will be conducted prior to the solicitation which will take effect next goal period. The contract currently contains ACDBE participation of 10.0% through a joint venture. The established participation will continue throughout the three-year goal period. Note that this contract is not exclusive as there is another operator also selling news/gift items. Those sales were included in specialty retail to highlight the participation in the larger contract.

Specialty Retail – Specialty retail contracts currently in place are not expiring during this goal period and do not contain ACDBE participation. We will project specialty retail sales without ACDBE participation for the two-year goal period.

Duty Free Retail – Duty Free retail contracts currently in place are not expiring during this goal period and do not contain ACDBE participation. We will project specialty retail sales without ACDBE participation for the two-year goal period.

Advertising - The advertising contract is currently operated under an LTE through March 31, 2026. We will conduct a goal analysis for this opportunity prior to solicitation; however, it is unlikely that a goal will be set for this opportunity as there are currently no ACDBE advertising firms in the Alaska UCP Directory and the size of the contract does not support subcontracting. We have worked with the current operator to encourage ACDBE participation in the supply of goods and services; however, there is little purchasing activity associated with this contract. We

will assume that this contract will continue without ACDBE participation throughout this two-year goal period although we will continue to encourage supplier participation and to outreach to potential suppliers.

Luggage Carts – Smarte Cart operates the luggage cart contract at the Airport. The Agreement does not expire until 2032 and does not include ACDBE participation. The concession will continue during the remaining goal period without an ACDBE goal.

The following in-terminal concessions each generated less than \$500,000 in gross revenues in FFY 2024. Given the small size of each of these concessions and the lack of subcontracting opportunities, goals have not been set for these concessions. These concessions represent an opportunity to obtain race-neutral participation as small businesses may be competitive for these opportunities as they arise.

ATMs/Ready Credit – These concessions generated less than \$30,000 in FFY 2024. Given the size of this opportunity, we do not anticipate setting a goal for these concessions during this two-year goal-period.

Vending - The vending contract has no ACDBE goal and does not expire until 2031 The concession will continue during the remaining goal period without an ACDBE goal.

Gross revenues for the ANC concessions have been projected utilizing a 4% annual growth rate for all concessions.

| Ted Stevens Anchorage International Airport ACDBE CONCESSION LEASING GOALS - Sales Projections Goal Period: Oct 1 2024 – September 30, 2026 FFY 2025 and 2026 | | | |
|--|---------------------|---------------------|----------------------------|
| Contract Type | 2025 | 2026 | Total 2025-2026 |
| Food/Beverage | \$37,765,438 | \$39,276,056 | \$77,041,494 |
| Gift/News | \$10,672,307 | \$11,099,200 | \$21,771,507 |
| Duty Free | \$1,782,444 | \$1,853,741 | \$3,636,185 |
| Specialty Retail | \$9,482,342 | \$9,861,636 | \$19,343,979 |
| Advertising | \$1,784,826 | \$1,856,219 | \$3,641,045 |
| ATM/Ready Credit | \$29,604 | \$30,788 | \$60,391 |
| Luggage Cart | \$811,610 | \$844,074 | \$1,655,684 |
| Vending | \$331,400 | \$344,656 | \$676,056 |
| Total Concessions (Excluding Rental Cars) | \$62,659,971 | \$65,166,370 | \$127,826,341 |

Given the above projected gross revenues and applying the ACDBE participation for each category of concessions as described above results in the following overall ACDBE goal for FFYs 2025 – 2026.

| Ted Stevens Anchorage International Airport ACDBE CONCESSION LEASING GOALS Goal Period: October 1, 2024 - September 30, 2026 FFYs 2025 and 2026 | | | |
|--|--|-----------------------------|-------------------|
| Concession | Projected Two-Year Gross Revenues | ACDBE Gross Revenues | ACDBE Goal |
| Food/Beverage | \$77,041,494 | \$7,550,066 | 9.8% |
| Gift/News | \$21,771,507 | \$2,177,151 | 10.0% |
| Duty Free | \$3,636,185 | | |
| Specialty Retail | \$19,343,979 | | |
| Advertising | \$3,641,045 | | |
| ATM/Ready Credit | \$60,391 | | |
| Luggage Cart | \$1,655,684 | | |
| Vending | \$676,056 | | |
| Total Concessions (Excluding Rental Cars) | \$127,826,341 | \$9,727,217 | 7.6% |

Given the above, we propose the base ACDBE goal for FFYs 2025 - 2026 at 7.6%.

Step 2 – Adjustments

The ACDBE regulation (49 CFR part 23) provides for a Step 2 adjustment of the developed base goal for a variety of factors, including the current capacity of ACDBEs to perform work in the concession program, as measured by the volume of work ACDBEs have performed in recent years. ACDBE achievement for the most recent three-year period is as follows:

| Actual Past History of ACDBE Participation | | | |
|--|----------------------|----------------------|---------|
| YEAR | TOTAL GROSS REVENUES | ACDBE GROSS REVENUES | ACDBE % |
| 2023 | \$51,626,970 | \$4,257,405 | 8.25% |
| 2022 | \$44,682,087 | \$3,991,808 | 8.93% |
| 2021 | \$29,512,622 | \$1,188,119 | 4.03% |

Adjusting for the median past participation over the last three years results in the following:

$$\text{Base goal of 7.6\%} + \text{Median ACDBE Participation (2021 - 2023) of 8.3\%} = 15.9\%$$

$$15.9 \div 2 = 8.0\%$$

There is no other relevant data to support an adjustment to the base goal. Therefore, the proposed overall ACDBE goal for the two-year period commencing October 1, 2024 and ending September 30, 2026 is **8.0%**.

Breakout of Estimated Race-Neutral & Race Conscious Participation

ACDBE contract goals reflected in this document have been set as race-neutral goals. The Airport will continue to use race-neutral methods to encourage further participation throughout the goal period, including the following:

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. Implementing a small business program in compliance with 49 CFR part 23, section 23.26.

Consultation with Stakeholders

Although, in accordance with 49 CFR part 23, section 23.43(c), Stakeholder Consultation is not required as there will be no new non-car rental opportunities during this goal period, a stakeholder meeting was held on March 27, 2025. Invitations were sent to over 700 stakeholders notifying them of the meeting and inviting participation. In addition, a notice was posted on the Alaska DOT&PF website. Twenty-two individuals registered for the meeting, eight of which are employees of Alaska DOT. Nine non-Alaska DOT employee stakeholders attended the meeting. A copy of the attendance list may be found below. There were no comments specific to the goals with the exception of a request to clarify race-conscious vs race-neutral participation. A copy of the flyer that was posted on the website and emailed to over 700 stakeholders is shown below.

Stakeholder Meeting – List of Attendees

| Name (original name) | Email |
|----------------------------------|----------------------------|
| Avery Smith | avery.j.smith@em.com |
| Caleb Koorn | caleb.m.koorn@em.com |
| Dixie Niemi | dixie.niemi@em.com |
| Frank Donahue | fdonahue83@gmail.com |
| Katie Caswell | katie@alaska.org |
| Robert Hunsinger | robert.l.hunsinger@em.com |
| Stephanie Lane | stephanie.lane@veassis.com |
| STEPHANIE's Notetaker (Otter.ai) | doug.lane@veassis.com |



The Civil Rights Office (CRO) with the State of Alaska, Department of Transportation & Public Facilities (DOT&PF) invites public comment on our Federal Aviation Administration (FAA) Airport Concession Disadvantaged Business Enterprise (ACDBE) Goal Methodology for Federal Fiscal Year (FFY) 2025-2026. The purpose is to further educate stakeholders in the goal setting process, good faith efforts, reporting, and compliance. We encourage all stakeholders to share any barriers to participation in federally funded projects, effect of discrimination on opportunities for ACDBE firms, and additional ways to level the playing field to increase opportunities for all firms including ACDBE firms.

As a recipient of FAA funding the State of Alaska and the Civil Rights Office are required to submit an ACDBE Goal Methodology. This Goal Methodology has been prepared according to the criteria set forth in [49 CFR Part 23](#).

Join us for a Public Consultation Meeting to learn more!



When: Thursday, 03/27/2025

Time: 01:00 PM AKST

Where: Virtual over Zoom

Register: [Zoom Link](#)

Website: [ACDBE Goals & Public Participation](#)

Can't join us but still want to submit a comment? Here are some options:

- Email comments to dbegoalmethodology@alaska.gov
- Submit comments via Fax at 907-269-0844
- Mail comments to:

Alaska Department of Transportation and Public Facilities
ATTN: Civil Rights Office
P.O. Box 196900, Anchorage, AK 99519-6900

Questions? Please contact the State of Alaska DOT&PF Civil Rights Office at:

- Phone: 907-269-0844
- Email: dbegoalmethodology@alaska.gov

This Goal Methodology was written and collaborated with ACC Consulting, LLC and State of Alaska, DOT&PF Civil Rights Office.

Overall Goal Calculation for Car Rentals (23.45) **FFY 2025-2026**

Background

Ted Stevens Anchorage International Airport currently has eight (8) different on-airport car rental brands owned by seven (7) different companies. The current agreements expire in spring 2025. The ACDBE car rental goal developed herein will apply to the two-year goal period, including any new agreements and extensions. The goal has been developed based on the purchase of goods/services. Car rental concession revenues were in excess of \$91.4 million in 2024. Total purchases for the same period were approximately \$37.4 million.

In accordance with the regulation regarding ACDBE participation in Airport Concessions, we have conducted research to determine an appropriate ACDBE goal for car rental concessions at the Airport. The methodology for setting the goals is included in this report.

49 CFR Part 23 provides the following guidance for establishing concession goals:

§ 23.51(a) Your objective in setting a goal is to estimate the percentage of the base calculated under §§23.47–23.49 that would be performed by ACDBEs in the absence of discrimination and its effects.

(1) This percentage is the estimated ACDBE participation that would occur if there were a “level playing field” for firms to work as concessionaires for your airport.

(2) In conducting this goal setting process, you are determining the extent, if any, to which the firms in your market area have suffered discrimination or its effects in connection with concession opportunities or related business opportunities.

(3) You must complete the goal-setting process separately for each of the two overall goals identified in §23.41 of this part.

(b) (1) Each overall concessions goal must be based on demonstrable evidence of the availability of ready, willing and able ACDBEs relative to all businesses ready, willing and able to participate in your ACDBE program (hereafter, the “relative availability of ACDBEs”).

(2) You cannot simply rely on the 10 percent national aspirational goal, your previous overall goal, or past ACDBE participation rates in your program without reference to the relative availability of ACDBEs in your market.

(3) Your market area is defined by the geographical area in which the substantial majority of firms which seek to do concessions business with the airport are located and the geographical area in which the firms which receive the substantial majority of concessions-related revenues are located. Your market area may be different for different types of concessions.

Counting Participation in Car Rentals

Given the fact that there are few ACDBE car rental firms operating in airports, we have elected to base the Car Rental ACDBE goal on the purchase of goods and services from ACDBE or potential/ACDBE firms. The regulation provides for counting ACDBE participation for car rentals as follows:

§ 23.53 How do car rental companies count ACDBE participation toward their goals?

(a) As a car rental company, you may, in meeting the goal the airport has set for you, include purchases or leases of vehicles from any vendor that is a certified ACDBE.

(b) As a car rental company, if you choose to meet the goal the airport has set for you by including purchases or leases of vehicles from an ACDBE vendor, you must also submit to the recipient documentation of the good faith efforts you have made to obtain ACDBE participation from other ACDBE providers of goods and services.

(c) While this part does not require you to obtain ACDBE participation through direct ownership arrangements, you may count such participation toward the goal the airport has set for you.

(d) The following special rules apply to counting participation related to car rental operations:

(1) Count the entire amount of the cost charged by an ACDBE for repairing vehicles, provided that it is reasonable and not excessive as compared with fees customarily allowed for similar services.

(2) Count the entire amount of the fee or commission charged by an ACDBE to manage a car rental concession under an agreement with the concessionaire toward ACDBE goals, provided that it is reasonable and not excessive as compared with fees customarily allowed for similar services.

(3) Do not count any portion of a fee paid by a manufacturer to a car dealership for reimbursement of work performed under the manufacturer's warranty.

(e) For other goods and services, count participation toward ACDBE goals as provided in part 26, §26.55 and §23.55 of this part. In the event of any conflict between these two sections, §23.55 controls.

(f) If you have a national or regional contract, count a pro-rated share of the amount of that contract toward the goals of each airport covered by the contract. Use the proportion of your applicable gross receipts as the basis for making this pro-rated assignment of ACDBE participation.

Example to paragraph (f): Car Rental Company X signs a regional contract with an ACDBE car dealer to supply cars to all five airports in a state. The five airports each account for 20 percent of X's gross receipts in the state. Twenty percent of the value of the cars purchased through the ACDBE car dealer would count toward the goal of each airport.

Market Area

The Car Rental Concessions at the Airport are currently operated by seven (7) different companies. Based on the types of goods/services purchased by the firms (e.g. auto repair, insurance, fuel, etc.), we have separated the market area based on the type of goods/services purchased as shown on the chart below. The geographic region for the purchase of vehicles includes various areas of the country, including from manufacturers in various states. We will, therefore, use a national geographic region for vehicle purchases and other categories of purchases that are typically procured through national contracts or from vendors in various

states, a state-wide geographic region for regional purchases, and a local geographic region for categories of goods/services purchased locally.

Goal-Setting Step I

The regulation provides the following examples of potential approaches for accomplishing Step 1, determining the base figure, as follows:

23.51(c) Step 1. You must begin your goal setting process by determining a base figure for the relative availability of ACDBEs. The following are examples of approaches that you may take toward determining a base figure. These examples are provided as a starting point for your goal setting process. Any percentage figure derived from one of these examples should be considered a basis from which you begin when examining the evidence available to you. These examples are not intended as an exhaustive list. Other methods or combinations of methods to determine a base figure may be used, subject to approval by the FAA.

(1) Use DBE Directories and Census Bureau Data. Determine the number of ready, willing and able ACDBEs in your market area from your ACDBE directory. Using the Census Bureau's County Business Pattern (CBP) data base, determine the number of all ready, willing and able businesses available in your market area that perform work in the same NAICS codes. Divide the number of ACDBEs by the number of all businesses to derive a base figure for the relative availability of ACDBEs in your market area.

(2) Use an Active Participants List. Determine the number of ACDBEs that have participated or attempted to participate in your airport concessions program in previous years. Determine the number of all businesses that have participated or attempted to participate in your airport concession program in previous years. Divide the number of ACDBEs who have participated or attempted to participate by the number for all businesses to derive a base figure for the relative availability of ACDBEs in your market area.

(3) Use data from a disparity study. Use a percentage figure derived from data in a valid, applicable disparity study.

(4) Use the goal of another recipient. If another airport or other DOT recipient in the same, or substantially similar, market has set an overall goal in compliance with this rule, you may use that goal as a base figure for your goal.

(5) Alternative methods. (i) You may use other methods to determine a base figure for your overall goal. Any methodology you choose must be based on demonstrable evidence of local market conditions and be designed to ultimately attain a goal that is rationally related to the relative availability of ACDBEs in your market area.

We have decided to use the DBE Directories and Census Bureau Data method for determining availability as follows:

The most recent available census bureau data is for 2022. The NAICS codes for the various trades typically utilized by car rental concessions were determined through a survey of car rental concessionaires and research and are shown on the chart below. Both DBEs and ACDBEs from the Alaska DBE Directory have been included as any firm that meets the DBE eligibility requirements are potential ACDBEs.

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/DBEs.
<https://dot.alaska.gov/cvlrts/directory.shtml>
- 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). <https://faa.dbesystem.com/>
- Census Bureau Data: The Census Bureau's County Business Pattern (CBP) database contains data regarding available firms by location and NAICS code.
<https://data.census.gov/>

| NAICS CODE | Type of Goods and Services | Total ACDBES/DBEs | Total All Firms Census 2022 | % |
|---------------------------|----------------------------|-------------------|-----------------------------|--------------|
| 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 Municipality | | 1 | 158 | 0.63% |
| 423850 | Cleaning Supplies | 0 | 9 | 0.00% |
| 441310 | Auto Parts Supplies | 0 | 104 | 0.00% |
| 517311 | Phone System | 1 | 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 | 376 | 9,645 | 3.92% |
| 441110 | New Car Dealership | 7 | 21,622 | 0.03% |
| 524210 | Insurance | 249 | 135,939 | 0.18% |
| 541211 | Accounting | 329 | 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% |

The base car rental ACDBE goal is 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)).

Base Dollar Amount for the Car Rental Goal

Using 2024 purchases as a base, we estimate a 4% annual increase in 2025 and 2026.

FFY 2024 = \$37,382,241 + 4% (\$1,495,290) = \$38,877,531

FFY 2025 = \$38,877,531 + 4% (\$1,555,101) = \$40,432,632

FFY 2026 = \$40,432,632 + 4% (\$1,617,305) = \$42,049,937

Total 2025 + 2026 = \$40,432,632 + \$42,049,937 = \$82,482,569

\$82,482,569 is the base dollar amount of purchases for the 2025-2026 car rental goal.

The calculated weighted percentage of 0.7% will be applied to the purchase amount in order to determine the anticipated ACDBE dollars.

Step 2 - Examine the data to determine what adjustment, if any, is needed to the Base Figure

The ACDBE regulation (49 CFR part 23) provides for a Step 2 adjustment of the developed base goal for a variety of factors, including the current capacity of ACDBEs to perform work in the concession program, as measured by the volume of work ACDBEs have performed in recent years. ACDBE achievement for the most recent three-year was reported as \$0/0%. In addition total purchase dollars were not reported. Therefore, we have elected not to adjust the goal as there is no relevant information available to support an adjustment.

We, therefore, propose the Car Rental ACDBE Goal at 0.7%.

Race-Neutral/Race-Conscious Recommendation

The current car rental agreements do not include a race conscious ACDBE goal, therefore the goal will be set as race-neutral. The agreements expire in 2025. We are conducting a Disparity Study and will reserve the right to set a race-conscious goal in the future.

Consultation with Stakeholders

In accordance with 49 CFR part 23, section 23.43(c), Stakeholder Consultation was conducted through a Stakeholder Meeting was held on March 27, 2025. Invitations were sent to over 700 stakeholders notifying them of the meeting and inviting participation. In addition, a notice was posted on the Alaska DOT&PF website. Twenty-two individuals registered for the meeting, eight of which are employees of Alaska DOT. Nine non-Alaska DOT employee stakeholders attended the meeting. A copy of the attendance list may be found below. There were no comments specific to the goals with the exception of a request to clarify race-conscious vs race-neutral participation. A copy of the flyer that was posted on the website and emailed to over 700 stakeholders is shown below.

Stakeholder Meeting – List of Attendees

| Name (original name) | Email |
|----------------------------------|--------------------------------------|
| Avery Smith | avery.j.smith@em.com |
| Caleb Koorn | caleb.m.koorn@em.com |
| Dixie Niemi | dixie.niemi@em.com |
| Frank Donahue | fdonahue83@gmail.com |
| Katie Caswell | katie@alaska.org |
| Robert Hunsinger | robert.l.hunsinger@em.com |
| Stephanie Lane | stephanie.lane@veassis.com |
| STEPHANIE's Notetaker (Otter.ai) | doug.lane@veassis.com |
| Tonya's Notetaker (Otter.ai) | tlewter@newmillenniumdevelopment.com |



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Join us for a Public Consultation Meeting to learn more!



When: Thursday, 03/27/2025

Time: 01:00 PM AKST

Where: Virtual over Zoom

Register: [Zoom Link](#)

Website: [ACDBE Goals & Public Participation](#)

Can't join us but still want to submit a comment? Here are some options:

- Email comments to dbegoalmethodology@alaska.gov
- Submit comments via Fax at 907-269-0844
- Mail comments to:

Alaska Department of Transportation and Public Facilities
ATTN: Civil Rights Office
P.O. Box 196900, Anchorage, AK 99519-6900

Questions? Please contact the State of Alaska DOT&PF Civil Rights Office at:

- Phone: 907-269-0844
- Email: dbegoalmethodology@alaska.gov

This Goal Methodology was written and collaborated with ACC Consulting, LLC and State of Alaska, DOT&PF Civil Rights Office.

Stakeholder Meeting – List of Attendees

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