

BOISE AIRPORT ACDBE GOAL SETTING FY 2016-2018

The methodology for setting ACDBE Goals for FY 2016-2018 follows the format utilized to set the goals for FY 13-FY 15 as approved by FAA. The advertising contractor, a DBE, sold to a non-DBE firm. The certification in Idaho of an existing ACDBE will increase ACDBE revenues. The overall presence of potential ACDBE's certified in Idaho is very small which makes the base figure for ACDBE participation less than one percent for Non-Car Rent Concessions and for Car Rent Car Rent Concessions. The three year goal of non-car rent ACDBE participation is 6.0% and for Car Rent ACDBE participation is 0.5%.

*BOI ACDBE Goals
Fiscal 2016-2018*

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Overall Goal Calculation for Concessions Other Than Car Rentals

Name of Recipient: Boise Airport

Goal Period: FY-2016-2017-2018 – October 1, 2015 through September 30, 2018

Overall Three-Year Goal:

0%, to be accomplished through RC and 6.0% RN

The Boise Airport has determined the market area is as follows:

Market Area for Non-Car Rental Concessionaires

Food & Beverage		Location	DBE
Delaware North/DNC	Food Service	Nationwide	No
Big City Coffee (DNC) 4% proposed , License	Food-Coffee	Boise	Yes
Sprout Healthy Vending Foods	Vending	Regional	No
Communications-Telephone		Nationwide	No
Gift and News			
The Paradise Shops		Nationwide	No
Taters II, LLC (Paradise) 5% proposed Joint Venture	Specialty Retail	Boise	Yes
Forever Heather	Specialty Retail	Nationwide	Yes
Simplicity Products		Statewide	No
Advertising			
Lamar Advertising	Advertising	Nationwide	No
Small Concessions/Services			
Ellis Amusement	Arcade Games	Boise	No
H&W Services	Shoe Shine	Boise	Yes
Smarte Carte via H&W Services	Luggage Carts & Massage Chairs	Nationwide	Yes

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Art Source Gallery	Art	Boise	No
US Bank ATM	ATM	Nationwide	No
Zoom (Best Buy)	Vending Retail	Nationwide	No
Non-Aviation Land Leases			
Airport Chevron	C-Store, Fuel	Boise	No
F&C Corporate Offices Land Lease	Office Buildings, Restaurant	Boise	No
Hotel/Motels	Motel	Boise/Regional	No

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 the geographical area in which the firms receive a substantial majority of concessions related revenues are located.

Base of Goal

To calculate the base of the goal Boise Airport considered more than the previous 3 fiscal years of gross concession receipts going back to 2010 and the next 3 years of projected concession revenue gross receipts. The calculation for DBE revenues for FY 16-18 used the FY 13-15 median of 4.57% as well as the revenue estimates in the DNC North and Paradise proposals. Delaware North (DNC) the food and beverage concessionaire for the terminal pledged in its proposal to have 4% of their gross revenues coming from DBE participation. The Paradise Shops have pledged 5% ACDBE participation from a joint venture with Taters II, LLC. The airport anticipates having continued participation from HW services. Forever Heather was recently certified as a DBE in Idaho. However, the Younger Agency, the terminal advertising concessionaire sold to Lamar Advertising. The estimated concession revenues and ACDBE participation for fiscal 2016, 2017 and 2018 reflect these changes.

Airport Chevron, F&C office buildings and restaurant and three Hotel/Motels are listed in the table above but are not considered as part of the Base Goal. These are long term land leases which do not expire during the goal period. Two of the motels are owned by people of sub-continent Asian ethnicity and therefore are not eligible to become DBE's.

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Gross Receipts for Previous 3 Years - Non-Car Rental Concessions

Fiscal Year	Concessions Revenue (Excluding Car Rental)	DBE Revenue	% of Total
2010	\$11,772,161	\$607,214	5.15%
2011	\$13,245,078	\$556,697	4.20%
2012	\$13,824,190	\$678,768	4.01%
Total	\$38,841,429	\$1,842,679	
Average 2010-2012	\$12,947,143	\$614,226	4.74%
2013 Actual	\$13,155,335	\$578,344	4.39%
2014 Actual	\$13,843,621	\$609,251	4.40%
2015 Estimate	\$13,837,320	679,486	4.91%
Total 2013-2015	\$40,836,276	\$1,867,081	4.57%
Average	\$13,621,092	\$622,360	4.57%
2016 Goal	\$12,779,557	\$772,251	6.04%
2017 Goal	\$13,159,736	\$795,418	6.04%
2018 Goal	\$13,551,300	\$819,281	6.04%

These numbers reflect terminal concessions. 2016-2018 Goals are based on proposals from DNC and Paradies plus miscellaneous concessions including Forever Heather and H&W Services.

2015 is an estimate based on projections from new contracts with Paradies (News & Gift), and Delaware North (Food & Beverage). BOI "graduated" one of their major contributors to DBE goals as the women owned Younger Agency was successfully sold to the larger non-DBE Lamar Advertising. However, DNCTHS, Delaware North, has pledged a 4% ACDBE participation and Paradies-Taters II, LLC has pledged a 5% ACDBE goal. BOI anticipates a continuation of H&W Services, providing shoe shine and luggage cart and massage chair services. Adding to ACDBE participation is Forever Heather now certified in Idaho as a DBE.

BOI reported achievement in 2014 of 6.42%. While the sale of the Younger Agency to a non-DBE will greatly impact the total ACDBE participation in the goal years, the addition of Forever Heather and the pledges from DNC North and Paradies make a goal of 6.0% achievable.

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Boise Airport estimates that terminal concession revenue will grow by 3% per annum assuming strengthening business travel as demonstrated by the Albertson’s repurchase and re-establishment of their headquarters in Boise, and the Albertson’s purchase of Safeway. Leisure travel is also anticipated to continue to recover as Idaho and the Boise MSA are experiencing very low unemployment rates.

Passenger numbers fell from 2010 through 2014, but have started to recover.

PASSENGER NUMBERS	
Fiscal Year	Passenger Numbers
2010	2,785,524
2011	2,784,581
2012	2,778,292
Total	8,348,397
Average	2,782,799
2013 (1.0%) Actual	2,608,244
2014 Actual	2,685,688
2015 +Estimate + 1.4%	2,783,438
Total	8,077,370
Average	2,692,457
2016 Estimate +3%	2,866,941
2017 Estimate +3%	2,952,949
2018 Estimate+3%	3,041,537
Total 2016-2018	8,861,427
Average	2,953,809

Passenger Numbers for 2013 and 2014 were below forecast numbers used in the previous ACDBE goal calculation. While the economy in Idaho, especially the Ada-Canyon County MSA has the lowest unemployment numbers in several years, the overall travel seems to be lagging. Business fliers often are slow to come back to the market as business travel budgets are cut in lean times and restored slower than their profitability. One positive for the Boise travel market is the re-purchase of most of the Albertson’s Supermarket chain with headquarters reestablished to Boise. The recent purchase of the Safeway grocery chain by Albertsons should also have a positive business travel effect on the Boise market. Another positive effect on relatively high paying jobs is the construction of a maintenance facility on Boise Airport for Skywest

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Airlines. The fiscal 2016-2018 passenger numbers reflect a 3% per annum growth which is reflective of the optimism shown in the concessionaires' proposal numbers. It is reasonable to assume that business travelers will be back. However, if the airlines successfully demonstrate constraint in adding capacity system wide and at BOI, then these numbers may be optimistic.

To achieve a continued growth rate, airlines will need to continue to add net new seats into the market. Additional flying to Seattle by Delta and Salt Lake by Horizon as well as a SCASD grant to add Atlanta back into Delta's schedule make this type of growth achievable.

Possible negative impacts on concession sales include the change in the way that Southwest Airlines assigns boarding numbers and TSA Pre Check. In the past, passengers often showed up well in advance of Southwest flights so that they could get the lowest possible boarding number. Now these numbers are assigned via on-line check in up to 24 hours in advance. Additionally, some travelers pay for the right to have a lower number. TSA Pre Check allows pre-qualified passengers to pass through the security checkpoint more quickly. Many of these travelers are arriving at the airport later than they had been. It is expected that these travelers who are now arriving later than they may have in the past will have less dwell time while waiting for their flights and therefore will have less opportunity to spend money at concessions.

Inflation as measured by the Bureau of Labor Statistics, Consumer Price Index All Urban Consumers was 0.49% in FY 10, 3.50% in FY 11 and 2.15% in FY 12, 1.13% in FY 13, and 2.0% in FY 14. While drought related production price increases may be felt by concessionaires, it is unclear if they can pass these price increases on to customers.

Three of our major concession agreements expired on September 30, 2014. BOI negotiated ACDBE language into new agreements and proposals demonstrated their willingness to include DBE's in their concession programs. The three year goals reflect these commitments as well as the addition of Forever Heather as a DBE certified in Idaho. The loss of a major source of DBE revenue from the Younger Agency, which was made up for by the willingness of DNC North and Paradies to include DBE's in their program and the addition of Forever Heather.

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.

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Methodology used to Calculate Overall Goal

Goods and Services purchased were not used as a method of calculating overall goals.

Management Contract or Subcontract

BOI may be able to fulfill part of the percentage goal by including any business operated through a management contract or subcontract with an ACDBE. We, and the businesses at the airport, 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 contract or subcontract with a non-ACDBE and the gross revenue of business activities to which the management contract or subcontract pertains will not be added to this base in either the numerator or denominator.

Step 1: 23.51(c)

We determined the base figure for the relative availability of ACDBEs other than car rentals. as follows:

Numerator: Ready, willing, and able non-car rental ACDBEs in the market area
_____ divided by _____

Denominator: All ready, willing and able non-car rental concession firms in the market area

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The following table examines the total ACDBE's known to be certified by the Idaho Transportation Department vs. the number of businesses in the determined services area as reported by the U.S. Census Bureau.

NAICS	Type of Concession	Total ACDBE's	Total All Firms	Ada County	Firms Used	% DBE's
541850	Display Advertising	1	7	NA	7	14.28%
812199	Personal Care Services	2	NA	29	29	6.89%
517911	Telecommunication Resellers	1	10	NA		10%
448120	Women's Clothing	1	NA	47	47	0%
45121	Book & News Stores	0	NA	19	19	0%
453220	Gift, Novelty, Souvenir	0	NA	36	36	0%
454210	Vending	0	NA	8	8	0%
722211	Limited-service restaurants	1	NA	296	296	0%
722410	Alcohol drinking places	0	NA	68	68	0%
447110	Gas Station/Convenience Store	0	NA	97	97	0%
Total	DBE vs. Total Step 1	4	17	667	684	0.58%

The data source or demonstrable evidence used to derive the **numerator** was:

The Idaho Transportation Department DBE Directory
<http://www.itd.idaho.gov/civil/dbefirms.htm>.

Reference 23.51(c)(2).

We have also considered the number of ACDBE concessionaires at BOI and concessionaires who we have identified as being potentially owned by women and minorities who may be eligible to be certificated in the DBE program and who are likely small businesses. The number used as a numerator was the number of Boise Airport lessees who circumstantially may qualify to be certified as ACDBEs in the future

The ITD disparity study does not recommend using race conscious methods for determining contracting opportunities related to DBE programs.

The data source or demonstrable evidence used to derive the **denominator** was:

The United States Census Bureau <http://www.census.gov/econ/cbp/index.html> county business patterns. data as outlined in 23.51(c) (1).

When we divided the numerator by the denominator we arrived at the Step 1 base figure for **our overall goal for non-car rental concessions of 0.0058 or 0.58%**

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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.

If we count businesses by number who are presently certified DBE concessionaires at the airport we can adjust our **ACDBE 3 year** goal upward to 1.16%

If we adjust our goal to reflect actual gross receipts by existing ACDBEs at Boise Airport we could adjust our goal to an actual of 6.04%. The actual accomplishment FY 14 was reported to FAA as 6.42%. However, this included significant revenue from the Younger Agency. The achievement of 6.04% in FY 16-FY18 seems reasonable consider the sale of Younger to Lamar, the commitments by DNC and Paradies, the certification of Forever Heather as a DBE in Idaho, and the continuation of H&W. services.

The motels were considered as a potential source of concession revenue because one of their elements for determining rent is percentage of gross receipts. However, these were originally negotiated as off airport long term land commercial leases and there are no opportunities to negotiate terms and conditions during the goal period.

We are not including the motels in the calculation of the 3 year ACDBE goal because it would skew the data and lead to possible misinterpretation of what the real potential for ACDBE participation is at Boise Airport.

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 to 6.0%. Our overall goal for non-car rental concessions is 6.0% race neutral and 0% race conscious.

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

The disparity study performed by Idaho Transportation Department local market area states that race conscious goals should not be used for setting goals and that race neutral goals are appropriate for FAA projects. There is no recent legal case information available to show any evidence of barriers to entry or competitiveness of ACDBEs.

There is currently limited data available from which to determine what portion of the overall DBE goal can be obtained from race-neutral methods and what portion must be obtained from race-conscious methods. Because of the lack of sufficient evidence of discrimination or its effects, race-conscious goals will not be used.

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PUBLIC PARTICIPATION

Consultation: Section 23.43.

1. BOI consulted with the State of Idaho Department of Transportation DBE Supportive Services for the most recent list of certified DBE firms and the U.S. Census Bureau's web page for the most recent County Business Patterns Data. From the information obtained for the market area in which the airport concessionaires spend a substantial amount of their dollars, the certified DBE businesses were identified and the number of non-DBE businesses was determined. The information obtained was used in setting the Step 1 overall goal but no subsequent adjustment of the goal was made because the input was already considered in preparing the overall goal initially.
2. We forwarded a copy of the proposed ACDBE three year goals to our car rental and non-car rental concessionaires and held an informational meeting with interested stakeholders, ACDBEs and concessionaires accepting both oral and written input.
3. In accordance with our ACDBE Plan, we published our three year goals in the Idaho Statesman a notice of the proposed overall goal and make the goal available for inspection for 30 days following the date of the notice. The notice will also inform the public that we will accept comments for 45 days from the date of notice.
4. Comments that were received were considered for appropriateness in determining goals. No comments of substance were received.

Prior to submitting this goal to the FAA, Boise Airport forwarded this information on ACDBE Three Year goal setting to interested parties including concessionaires and DBE's. A stakeholder meeting, open to the public was held and both oral and written comments were solicited.

Stakeholders consulted included

1. Non Car Rental Concessionaires
2. Car Rental Concessionaires
3. ITD DBE Administrator
4. Open meeting

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Breakout of Estimated Race-Neutral & Race Conscious Participation:

The Boise Airport will meet the maximum feasible portion of its overall goal by using race-neutral means of facilitating ACDBE participation. The Boise Airport 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; and

We estimate that, in meeting our overall goal of 6.0%, we will obtain 6.0% from race-neutral participation and 0% through race-conscious measures.

1. We have exceeded our previous goal of 4% during the past three years primarily because our airport display advertising concessionaire is an ACDBE and the total revenue numbers are large as compared to the total concession revenues. Although we will not have advertising revenue as a DBE during the goal period, the addition of Forever Heather as a certified DBE in Idaho and the commitments made by DNC and Paradies will make this goal realistic.
2. Similar airport ACDBE goals are not available at this time.

We project that race-neutral measures, standing alone, are sufficient to meet our overall goal

- The Boise Airport historically holds quarterly meetings with concessionaires.
- The Boise Airport does have a history of ACDBE participation.

In order to ensure that our ACDBE program will be tailored to overcome the effects of discrimination, we will track and report ACDBE 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.

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Section 23.45: Overall Goal Calculation for Car Rentals

Amount of Goal

Boise Airport car rental gross receipts averaged \$36,778,588 for FY 2013, FY 2014, and FY 2015, therefore car rental goals are required for FY 2016-2018.

Name of Recipient: Boise Airport

Goal Period. FY-2016-2017-2018 – October 1, 2015 through September 30, 2018

Overall Three-Year Goal:

0.5%, to be accomplished through 0% RC and 0.5% RN

The Boise Airport has determined that its market area is Nationwide. None of the car rental companies are DBE's and no DBE car rental companies are anticipated at Boise Airport during the three year goal setting period.

Company	Type of Concession	Nationwide
Alamo-Midwest	Car Rental	XX
Avis-Avis Budget Group	Car Rental	XX
Budget-Avis Budget Group	Car Rental	XX
Dollar-DTG	Car Rental	XX
Enterprise	Car Rental	XX
Hertz-Overland West	Car Rental	XX
National-Midwest	Car Rental	XX
Thrifty-DTG	Car Rental	XX

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 the geographical area in which the firms receive a substantial majority of concessions related revenues are located. There is very little opportunity to purchase services from DBE's locally. Some services can be purchased from nationwide sources. None of the car rent companies are DBE's. They have utilized local DBE services for insurance and parking lot maintenance in the past.

DBE's certified in other states have an easier path to certification in multiple states including Idaho than they had in the past. However, if they don't certify in Idaho, it is

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difficult for local car rental companies to know who they are and therefore it is difficult for them to attempt to utilize their services.

There are numerous small businesses that could provide services to local car rental companies, but almost no small businesses that could provide these services have certified as DBE's.

Boise Airport car rental companies have indicated to us that they can meet their individual goals of 0.00%, 0.19%, 0.21%, 0.40%, 0.50%, or 1.00% aggregates to a 0.51% goal across all car rental companies at Boise if they use the goods and services purchased for the Boise operation.

Base of Car Rental Goal

To calculate the base of the goal Boise Airport considered the previous 3 fiscal years of gross concession receipts and the projected potential concession revenue (gross receipts) three years into the future including upcoming new opportunities.

Gross Receipts (Revenue) for Previous 3 Fiscal Years - Car Rental Concessions

Fiscal Year	Car Rental Concession Revenues
2013	35,889,513
2014	36,673,029
2015	37,773,220
Total	110,335,763
FY 13-15 Average	36,778,588

Rental car revenue has increased 2%-3% per year during FY13-15. We anticipate that they will continue to grow at a rate of 3% per year during the goal period FY 16-FY18.

The car rental concession opportunities anticipated during this goal period are limited to the purchase of goods and services from DBE's. DOT has considered supporting the utilization of DBE's on a nationwide basis from companies that are nationwide in scope. DOT will continue to consider developing a future rulemaking on nationwide car rental company goals. At the present time we can only use numbers from DBE services purchased from DBE's that certified in the State of Idaho.

We understand that nationwide car rental companies purchase goods and services from DBE firms. During this 3-year goal period we will continue collect reports from all car rental companies as to their utilization of DBE's to determine how we can apply this

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information to setting car rental DBE goals in the FY 19-21 time frame. If they can demonstrate through a cost allocation plan for vehicles, insurance, fuel and other goods and services that are either purchased directly for Boise Airport car rental operations, or indirectly such as in an allocation of cost for insurance, then we will take this information into consideration as it applies to each car rental company ACDBE goal and cumulatively to evaluate progress toward meeting the set three year goals.

Goods and Services such as Insurance, Automobiles, Automobile Repairs, Fuel, Facility Maintenance, Advertising, etc., has estimated gross expenditures of \$253,382 per annum based upon past reports from car rental companies and then extrapolated across all Boise Airport car rental companies.

At the present time there are only two DBE firms certified through the Idaho UCP which could supply services to the car rental companies.

Car dealerships are primarily engaged in the retail sale of new and/or used automobiles. Car dealerships frequently maintain repair departments and carry stocks of replacement parts, tires, batteries, and automotive accessories. Such establishments also frequently sell pickup trucks and vans at retail. In the standard industrial classification system, car dealerships are categorized in NAICS code 441110. There are no car dealerships NAICS code 441110 certified as DBE's in Idaho at this time.

There are NAICS code 441110 certified in other states and could likely be recognized in Idaho, it is unlikely that they would be close enough to provide repair or parts services, but they could be used for fleet purchases of vehicles.

The Car Rental Concession Agreements at Boise Airport expired on September 30, 2014. We do not anticipate any new car rental concession companies to indicate an interest of doing business at Boise Airport during the three year goal period. Because of this we do not anticipate a new concession opportunity arising prior to the end of this goal period. If a new car rental concession company with an estimated average of annual gross revenues are anticipated to be \$200,000 or greater, the Boise Airport 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

Goods and Services

Of the eight Car Rent companies who submitted offers for new concession agreements, two pledged 0% one pledged 0.19%, one pledged 0.21%, one pledged 0.40%, one pledged 0.50% and two pledged 1.00% ACDBE goals. If we use the percentage of individual car rental company revenue as compared to their contracted DBE goals we

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come to a weighted ACDBE goal for car rental companies of 0.51% of total purchases of goods and services.

Based on the reports of car rental companies, we have estimated total purchases of 49% of their total revenues. We can then calculate the individual car rental company annual goal

Car Rental DBE Goal Calculations

Company	Estimated Gross Receipts FY 16-FY18 \$122,420,880	Estimated Purchases @49%	DBE Goal	DBE Purchase Goal
Alamo	\$4,136,929	\$41,369	0%	\$0
Avis	\$18,852,141	\$9,237,549	1%	\$92,375
Budget	\$14,154,574	\$1,775,429	1%	\$17,754
Dollar	\$9,893,473	\$4,847,801	.21%	\$10,180
Enterprise	\$22,920,095	11,230,846	.50%	\$56,154
Hertz	\$34,790,259	\$17,047,226	.40%	\$68,188
National	\$11,093,928	\$5,436,024	0%	\$0
Thrifty	\$6,579,482	\$3,239,946	.19%	\$6,125
TOTAL	\$122,420,880	\$59,986,231	.51%*	\$305,929

The gross receipts and the estimated purchases are estimates based upon the percentage of the market that each car rental company had and the assumption that each company purchases goods and services of 49% of their total gross revenue.

We plan to meet the percentage goal by including the purchase from ACDBEs of goods and services purchased by car rental businesses for the Boise Airport car rental operations. The dollar value from purchases of goods and services from ACDBEs will be the numerator and, total car rental purchases of goods and services will be the denominator.

We will evaluate annual reports from car rent companies to track their progress toward meeting these goals, to document their good faith effort if they do not meet these goals and to work with the car rental companies and DBE's to see what can be done to attain these goals.

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Step 1: 23.51(c)

There are no ACDBE car rental companies at Boise Airport and there are only two DBEs in the market area who could supply goods and services to car rental companies. Therefore, we did not use a comparison mode.

The goal was structured entirely in terms of purchases of goods and services. In this case, we calculated our car rental overall goal by dividing the estimated dollar value of such purchases from ACDBEs by the total estimated dollar value of all purchases to be made by car rental companies. When we divided the numerator by the denominator we arrived at the Step 1 base figure for our overall goal for car rental concessions of: 0.51%

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 0.51%

Past History Participation

Because there are only two DBEs certificated in the Idaho UCP that car rental companies could purchase goods and services from, there is inadequate data available to adjust the DBE rate. If past participation was used the DBE goal would decrease.

The current ITD Disparity study had very little data available for FAA projects and recommends that FAA funded contracts, continue to operate all-neutral programs

There is no historical ACDBE data to reference to make an adjustment to the Step 1 base figure therefore the Boise Airport is adopting its Step 1 base figure as its overall goal for this 3-year goal period

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PUBLIC PARTICIPATION

Consultation: Section 23.43.

Car-Rental Public Participation is included with non-car rental concession public participation including the public meeting and provision of the proposed goals to each car rental agency.

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

The Boise Airport will meet the maximum feasible portion of its overall goal by using race-neutral means of facilitating ACDBE participation. The Boise Airport 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 0.51%, we will obtain 0.51% from race-neutral participation and 0% 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. Data from private sector MBE/WBE participation;
2. ACDBE participation in local programs in which there are no ACDBE concession specific goals;
3. Race-neutral business assistance efforts;
4. Information you obtained through consultation with stakeholders;
5. ACDBE participation on other city or county concession activity; and
6. Other Airport Concessions: Other comparable airports have not completed their ACDBE goals so they could not be used in a comparison approach.

If we project that race-neutral measures, standing alone, are not sufficient to meet an overall goal, we will not use race-conscious measures to meet the overall goal. 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

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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.