



SAN DIEGO COUNTY
REGIONAL AIRPORT AUTHORITY

San Diego International Airport Lindbergh Field

Proposed ACDBE Goal-Setting Methodology

**For
Three-Year FFYs 2012-2014**

Prepared by
Small Business Development Department

San Diego International Airport – Lindbergh Field
Airport Concession Disadvantaged Business Enterprise
(ACDBE) Program

Overall ACDBE Goal Setting Methodology

For

Three-Year Federal Fiscal Years (FFY) 2012-2014
(Covering the period October 1, 2011 through September 30, 2014)

**AIRPORT CONCESSION DISADVANTAGED BUSINESS ENTERPRISE (ACDBE)
PROGRAM ESTABLISHMENT OF THREE-YEAR CONCESSION GOAL FOR
FEDERAL FISCAL YEARS 2012-2014**

The San Diego County Regional Airport Authority (Airport Authority) has completed the initial review process for its three year Airport Concession Disadvantaged Business Enterprise (ACDBE) goal for Federal Fiscal Years 2012-2014.

The enclosed concession goals are submitted pursuant to 49 Code of Federal Regulations Part 23 Subpart D. This concession report will include the following:

- Overall ACDBE goal for a three year period commencing October 1, 2011 and ending September 30, 2014 for all concessions excluding car rental
- Overall ACDBE Goal for a three year period commencing October 1, 2011 and ending September 30, 2014 for car rentals
- Utilization of Race-Neutral and Race-Conscious Methods

SECTION I OVERALL AIRPORT CONCESSION DISADVANTAGED BUSINESS ENTERPRISE (ACDBE) GOAL FOR FFY 12-14

San Diego County Regional Airport Authority is in the process of awarding a number of new food/beverage, gift/news and specialty retail concessions at San Diego International Airport (SAN). These new concessions will begin December 1, 2012. It is anticipated that the new concession plan will offer a number of opportunities for concession contracts of varying size. In addition to the new concessions, there are other concessions which will be included in the overall goal calculations. The following trades represent all concessions used in calculating the goal:

Food Service

Casual Dining Restaurant

Bar w/ Food

Gourmet Coffee w/ or without prepared foods and/or baked goods

Snack Food

Gourmet Food Market

Quick Service Restaurant

Café/Bistro

Convenience Retail

Newsstand and Sundries

News and Gift

Newsstand w/ Coffee

Specialty Retail

Spa Service

Locally Themed Concept

Electronics & Gadgets

Bookstore

Apparel

Travel Items

Accessories and Leather Goods

Sports Merchandise and Apparel

Jewelry

Children's Gifts and Toys

Candy

Other Concessions

In-Terminal Advertising

Luggage Carts

Telecommunications

Business Services

Personal Services

Parking Management
Central Receiving Management

Since the food service, convenience retail and specialty retail account for more than 90% of the concession program, we will calculate these concessions separately and combine them with the remaining concessions for the final proposed ACDBE goal.

49 CFR Part 23.51 states, in part, as follows:

- (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.

49 CFR Part 23.51 further provides for a two-step process, consisting of:

- (c) Step 1. You must begin your goal setting process by determining a base figure for the relative availability of ACDBEs.
- (d) Step 2. Once you have calculated a base figure, you must examine all relevant evidence reasonably available in your jurisdiction to determine what adjustment, if any, is needed to the base figure in order to arrive at your overall goal.

Step 1: Goal Calculation Methodologies

Under *Section IX: Goal Methodology* of the Airport Authority’s Airport Concession Disadvantaged Business Enterprise Program Concession Plan, each overall concession goal will be based on the availability of ready, willing, and able ACDBEs relative to all businesses ready, willing and able to participate in our ACDBE program.

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

- (1) Use ACDBE 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) database, determine the number of all ready, willing and able businesses available in your market area that perform work in the same North American Industry Classification System (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.

The most recent available Census Bureau data is for 2008. However the North American Industry Classification System (NAICS) does not include specific classifications for airport operators and therefore, it is necessary to utilize broader classifications as shown in **Table 1- ACDBE Directory/Census Bureau San Diego County**. Clearly, the firms included in the census are not all ready, willing and able to operate airport concessions since history demonstrates that there are a relatively small number of airport concession operators in relation to the total number of establishments for each category.

Table 1 – ACDBE Directory/Census Bureau San Diego County					
Identified Potential Concepts	NAICS Description	NAICS Code	Census	Directory	%
Casual Dining Restaurant	Full-service restaurant	722110	2243	0	0.0%
Bar w/ Food	Drinking places (alcoholic beverages)	722410	346	0	0.0%
Gourmet Coffee w/ or without prepared foods and/or baked goods/Snack Foods	Snack and nonalcoholic beverage bars	722213	781	0	0.0%
Gourmet Food Market	All other specialty food stores	445299	54	1	1.9%
Quick Service Restaurant/Café Bistro	Limited-service restaurants	722211	2357	5	0.2%
Newsstand and Sundries	News dealers and newsstands	451212	11	2	18.2%
News and Gift	News dealers/Gift, novelty, souvenir stores	451212/453220	283	2	0.7%
Newsstand w/ Coffee	News dealers/Snack and nonalcoholic beverage bars	451212/722213	792	2	0.3%
Spa Service	Other personal care services	812199	197	0	0.0%
Locally Themed Concept	Other general merchandise stores	452990	237	0	0.0%
Electronics & Gadgets	Radio, television, and other electronics stores	443112	327	0	0.0%
Bookstore	Book stores	451211	99	1	1.0%
Apparel	Clothing and clothing accessories stores	448000	1696	1	0.1%
Accessories and Leather Goods	Luggage and leather goods stores	448320	19	0	0.0%
Sports Merchandise and Apparel	Sporting goods stores	445110	267	0	0.0%
Jewelry	Jewelry stores	448310	280	0	0.0%
Children's Gifts and Toys	Hobby, toy, and game stores	451120	87	0	0.0%
Candy	Confectionery and nut stores	445292	57	0	0.0%

The almost negligible results (with the exception of news dealers and newsstands) may be caused by the fact that firms do not seek certification unless and until there is an

opportunity available and this type of opportunity occurs infrequently. We do not believe that using this data provides accurate information regarding availability.

(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.

The airport maintains an online vendor registration for firms interested in doing business with the San Diego International Airport. Firms who have registered and expressed an interest in participating in food/beverage and/or retail concessions have been categorized by their concept as shown on **Table 2 – SDCRAA Vendor Registration** on the following page.

This type of list is obviously a better indicator of the number of firms who are "ready, willing and able" to operate at the airport since they have registered as interested parties. However, it should be noted that the firms are self-identified as M/W/DBE and may or may not be certifiable as ACDBEs. In addition, information relating to each firm's capabilities has not been captured. Firms currently operating at the airport have been included.

(3) Data from a Disparity Study. The third example provided by the regulation is to use data from a disparity study. The San Diego Regional Airport Authority published its draft disparity study in March 2010. The study was inconclusive with regard to disparity in Airport Concession leasing because the food/beverage and retail concessions have not been solicited since 1994 and ACDBE participation in the concessions occurs at a rate of approximately 24% as a result of a contract goal. Availability data was not included in the concessions portion of the study; however, recommendations were made regarding enhanced methods for setting future goals.

(4) Use the Goal of Another Recipient. The fourth example provided is to use the goal of another federal Department of Transportation (DOT) recipient. There are no other DOT recipients in the geographic area who are comparable in terms of their concession opportunities.

(5) Alternative Methods. The fifth example of a potential methodology for determining a base figure includes using any methodology based on demonstrable evidence of local market conditions and designed to ultimately attain a goal that is rationally related to the relative availability of ACDBEs in your market area. Each of the methodologies listed above contains flaws of varying degrees. However, we believe that with adjustments to the "Step 2" option, the Active Participants List approach outlined above provides the most reliable data and therefore we have elected not to explore alternative methods.

Table 2 – SDCRAA Vendor Registration

Identified Potential Concepts	NAICS Description	NAICS Code	Vendor Total	Self-Identified as M/W/DBE	%
Casual Dining Restaurant	Full-service restaurant	722110	36	13	36.1%
Bar w/ Food	Drinking places (alcoholic beverages)	722410	17	7	41.2%
Gourmet Coffee w/ or without prepared foods and/or baked goods	Snack and nonalcoholic beverage bars	722213	20	11	55.0%
Gourmet Food Market	All other specialty food stores	445299	3	0	0.0%
Quick Service Restaurant/Café Bistro	Limited-service restaurants	722211	25	12	48.0%
Newsstand and Sundries	News dealers and newsstands	451212	5	3	60.0%
News and Gift	News dealers/Gift, novelty, souvenir stores	451212/453220	22	13	59.1%
Newsstand w/ Coffee	News dealers/Snack and nonalcoholic beverage bars	451212/722213	2	2	100.0%
Spa Service	Other personal care services	812199	1	0	0.0%
Locally Themed Concept	Other general merchandise stores	452990	3	1	33.3%
Electronics & Gadgets	Radio, television, and other electronics stores	443112	2	0	0.0%
Bookstore	Book stores	451211	7	4	57.1%
Apparel	Clothing and clothing accessories stores	448000	12	7	58.3%
Travel Items	Other general merchandise stores	452990	3	1	33.3%
Accessories and Leather Goods	Luggage and leather goods stores	448320	5	1	20.0%
Sports Merchandise and Apparel	Sporting goods stores	445110	3	1	33.3%
Jewelry	Jewelry stores	448310	5	3	60.0%
Children's Gifts and Toys	Hobby, toy, and game stores	451120	4	1	25.0%
Candy	Confectionery and nut stores	445,292	6	3	50.0%

Summary ACDBE Availability Data

The summary of the ACDBE availability data as outlined above is as follows:

Table 3 - Summary Data/Comments		
Method	DBE %	Comments
(1) DBE Directory/Census	Food/Bev: 0.0% - 1.9% Gift/News: 0.3% - 18.2% Specialty: 0.0% - 1.0% Duty Free: 0.0%	Census data is over inclusive, directory date is under inclusive. Not recommended by the disparity study.
(2) Active Participant List	Food/Bev: 0.0% - 50.0% Gift/News: 59.1% - 100.0% Specialty: 0.0% - 60.0% Duty Free: 100.0%	Ability of firms to operate concessions not included in data or analyzed
(3) Disparity Study	N/A	Availability and disparity information not included
(4) Goal of another recipient	N/A	No other agencies with concession leasing in the relevant geographic market
(5) Alternative Method	N/A	Viable options available

Base Goal Recommendation

Since the most reliable data seems to be the Active Participant List, we propose to use the availability data from Table 2 above as the base goal for each trade. Since the data contains flaws, adjustments will be required as indicated in the next section. The overall goal will be calculated based on the trade weighting for the available opportunities.

Tables 4a and 4b below will show the ACDBE goal calculations for food & beverage and merchandise concessions.

Table 4a – Adjusted Availability: Food & Beverage (Based on Active Participant List (APL))					
Identified Potential Concepts	NAICS Description	NAICS Code	% from APL	Est. Gross Revenue	ACDBE Gross
Casual Dining Restaurant	Full-service restaurant	722110	36.1%	\$11.9	\$4.30
Bar w/ Food	Drinking places (alcoholic beverages)	722410	41.2%	\$12.7	\$5.2
Gourmet Coffee w/ or without prepared foods and/or baked goods & Snack Food	Snack and nonalcoholic beverage bars	722213	55.0%	\$8.8	\$4.8
Gourmet Food Market	All other specialty food stores	445299	0.0%	\$1.9	\$0
Quick Service Restaurant & Café/Bistro	Limited-service restaurants	722211	48.0%	\$23.2	\$11.1
Total Food & Beverage				\$58.5	\$25.4
\$25.4 Million ÷ \$58.5 Million = 43.4%					

Table 4b – Adjusted Availability: Merchandise (Based on Active Participant List (APL))					
Identified Potential Concepts	NAICS Description	NAICS	% from APL	Est. Gross Revenue	ACDBE Gross
Newsstand and Sundries	News dealers and newsstands	451212	60.0%	\$24.1	\$14.5
Spa Service	Other personal care services	812199	0.0%	\$1.3	\$0.0
Travel Items and Locally Themed Concept	Other general merchandise stores	452990	33.3%	\$1.3	\$.4
Electronics & Gadgets	Radio, television, and other electronics stores	443112	0.0%	\$2.7	\$0
Bookstore	Book stores	451211	57.1%	\$4.5	\$2.6
Apparel	Clothing and clothing accessories stores	448000	58.3%	\$1.8	\$1.0
Accessories and Leather Goods	Luggage and leather goods stores	448320	20.0%	\$1.3	\$.3
Sports Merchandise and Apparel	Sporting goods stores	445110	33.3%	\$.8	\$.3
Jewelry	Jewelry stores	448310	60.0%	\$1.2	\$.7
Children's Gifts and Toys	Hobby, toy, and game stores	451120	25.0%	\$.6	\$.2
Candy	Confectionery and nut stores	445292	50.0%	\$.3	\$.2
Total Merchandise				\$35.7	\$20.2
\$20.2 Million ÷ \$35.7 Million = 56.6%					

Food & Beverage Services and Merchandise Adjustments to Base Figures

In order to determine what adjustment to the base goal might be needed, we looked at a variety of information as shown below.

- (1) **Economic Census.** The 2002 Economic Census results were released in phases between 2008 and July 2010. Data from this census indicates that the city of San Diego ranks tenth in terms of the number of minority-owned employer firms out of 2,819 geographic areas included in the Company Statistics Series for Selected Places With 100 or More Minority-Owned Firms as shown on **Table 5** below.

Table 5 2002 Survey of Business Owners Release Date: 6/20/2008 Company Statistics Series: Statistics for Selected Places With 100 or More Minority-Owned Firms				
* Rank	Geographic Area Name (City)	Number of minority-owned firms	Number of minority-owned employer firms	Number of minority-owned nonemployee firms
1	New York, NY	324,594	37,795	286,799
2	Los Angeles, CA	156,295	23,588	132,707
3	Houston, TX	78,904	9,233	69,671
4	Chicago, IL	70,863	8,407	62,456
5	San Francisco, CA	27,384	7,194	20,190
6	Honolulu, HI	24,611	6,695	17,916
7	Miami, FL	41,596	6,648	34,948
8	San Antonio, TX	35,427	6,218	29,209
9	San Jose, CA	25,101	5,533	19,568
10	San Diego, CA	28,125	4,851	23,275

*Based on number of minority owned employer firms

While the 2002 Economic Census does not provide trade information by race and gender at a County level, the information is available at the State level. As shown on **Tables 6 & 7** that follow, the percentage of firms owned by historically underrepresented groups does not match the average gross receipts for the same groups and in both cases, the average gross receipts are less than the number of firms.

Data from the 2007 economic census relating to the number of minority owned businesses in San Diego County was published, in part, on December 7, 2010. The data includes the number of Hispanic-owned and women-owned firms in San Diego County. Data for the remaining minority groups is scheduled to be published by mid - 2011. For this reason, we used 2002 data.

Table 6 2002 Economic Census Survey of Business Owners – Employer Firms Only (Accommodation/Food Service Firms) State of California					
	Minority Owned	Women Owned	Total M/W Owned	Total Firms	% M/W Owned
**Number of Accommodation /Food Service Firms	25,270	5,882	31,152	51,716	60.2%
Avg Gross Receipts	\$472,829	\$863,221	\$546,541	\$1,069,336	*30.8%
*Percent of gross revenues earned by minority/women owned firms					
** Includes firms in the accommodation trade					

Table 7 2002 Economic Census Survey of Business Owners – Employer Firms Only (Retail) State of California					
	Minority Owned	Women Owned	Total M/W Owned	Total Firms	% M/W Owned
Number of Retail Firms	20,871	11,557	32,428	76,054	42.6%
Avg Gross Receipts	\$1,360,475	\$1,004,909	\$706,000	\$4,801,831	*9.9%
*Percent of gross revenues earned by minority/women owned firms					

(2) Past History. The current food/beverage and retail concessions at San Diego International Airport are operated by Host under a contract that was awarded in 1994. According to the SDCRAA Disparity Study, Host has a MBE/WBE goal of 30%. During the study period, 2003-2007, the airport achieved MBE/WBE participation of 21.3% in its food/beverage concessions and 30.7% in its retail concessions.

(3) Disparity Study. The study recommends several factors to consider in adjusting the base goal, including the current capacity of ACDBEs to perform the work as measured by recent participation and data on employment, education, training and union apprenticeship programs.

Adjustment Ratio

The data from the economic census indicates that a downward adjustment is needed since the average gross receipts generated by minority and women owned firms is significantly less than their representation in terms of number of firms. This indicates that the capacity of firms to perform the available concession contracts is somewhat less than the data suggests based on the number of firms.

Availability based on the number of firms for accommodation/food service firms in San Diego County is 60.2%; however those firms generate only 30.8% of the gross receipts. This equate to a ratio 51.1% ($30.8\% / 60.2\% = 51.1\%$). We propose to assume the same ratio between the number of firms and capacity applied to the Active Participants List generated by the airport. Applying the same methodology for retail where the number of firms equates to 42.6% while only 9.9% of the gross receipts are generated by the same group. This equates to a ratio of 23.3% ($9.9\% / 42.6\% = 23.3\%$).

In other words, based on the data, the average non-minority firm is either large or publicly-owned or with a greater capacity to operate the concession contracts than minority-owned firms. Smaller contracts may result in a larger share of minority/women owned firms with the capacity to operate those specific contracts. Recent participation also argues for the goal to be reduced as many of the availability calculations based on the Active Participant List result in significantly higher availability than current utilization. Adjusting based on the ratio of gross revenues to number of firms will bring these calculations more in line and can then be further adjusted by averaging with past history.

Adjustment on the food & beverage and merchandise are as follows:

Table 8					
Food & Beverage and Merchandise Adjustment					
Category	ACDBE Percentage from Tables 4a/4b	# of Firms vs. Revenue Generation Ratio	Adjusted ACDBE Percentage (Col A x Col B)	Past ACDBE Performance	Average Between Adjusted and Past Performance $\frac{\text{Col. C} + \text{Col. D}}{2}$
	Column A	Column B	Column C	Column D	Column E
Food & Beverage	43.4%	51.1 %	22.2%	21.3 %	21.8
Merchandise	56.6%	23.3%	13.2%	30.7%	22.0

Overall Goal Calculation for Food/Beverage, News/Gifts and Specialty Retail

The recommended goals by trade classification have been weighted based on the package configuration and estimated sales data as developed through the Concession Development Program. The goal for food/beverage has been calculated at 21.8% and represents 59% of the total food/beverage and merchandise revenues (\$56.9M ÷ \$96.2M) = .591). Meanwhile, the ACDBE goal for the news/gift retail is 22.0% and represents 41% (\$39.3M ÷ \$96.2M = .408). The formula used to calculate the weighted goal is as follows:

(F/B Sales X F/B ACDBE Goal + G/N Sales X G/N ACDBE Goal) ÷ Total Sales = Overall ACDBE Goal

$$(\$56.9 \times 21.8\% + \$39.3 \times 22.0\%) \div \$96.2 = 22.0\%, \text{ or;}$$

$$(\$12.4 + \$8.6) \div \$96.2 = 22\%$$

The weighting process produces an overall goal of 22.0% for the food/beverage, news/gift concessions in total as shown on **Table 9** below. It should be noted that there were no expressions of interest for the trade classification of “automated retail” nor is there a trade classification that specifically fits. We have assumed no goal for that trade classification, but will continue to research ACDBE availability for that trade and make a future adjustment, if necessary.

Table 9				
ACDBE Goal – Food/Beverage, News/Gifts and Specialty Retail				
	Sq Ft	Mid-Range Sales	% ACDBE Goal	\$ ACDBE Goal
Food/Beverage	53,159	\$56.9	21.8%	\$12.4
News/Gifts, Retail	30,053	\$39.3	22.0%	\$8.6
Total	83,212	\$96.2	22.0%	\$21.0

Concessions Other Than Food, Beverage and Merchandise

Other concessions included in the ACDBE goal calculations are as follows:

- In-Terminal Advertising
- Luggage Carts
- Telecommunications
- Business Services
- Personal Services
- Parking Management
- Central Receiving Management

Of the concessions listed above, the in-terminal advertising concession is under agreement with terms that will not expire during this three year goal period (2012-2014).

The gross revenue is anticipated to be \$2.7 million per year on average. The ACDBE participation for this concession is <.5%.

It is anticipated that the remaining categories will provide new opportunities during the three year goal period. The anticipated dates for these upcoming opportunities are shown on **Table 10** below.

Table 10 Other Concessions Opportunities During the Goal Period			
CATEGORY	ANNUAL VALUE	CURRENT ACDBE	EXPIRATION YEAR
Telecommunications	< \$90,000	0	2013
Business Service	< \$110,000	0	2011
Personal Services	\$90,000	100%	2014
Parking Management	\$450,000	0%	2011
Luggage Carts	\$300,000	0%	2013

In determining the base figures for the categories listed above, the Airport used the same methodology selected to evaluate the food & beverage and merchandise concessions used earlier. Results of the comparison from the Active Participants List are shown on **Table 11**.

Table 11 Other Concessions Opportunities Vendor Registration			
Category	Total # of Companies Registered	Total # of Self Identified as M/W/DBE	Pct. By Category
Telecommunications	167	47	28.1%
Business Services	495	236	47.7%
Personal Services	17	11	64.7%
Parking Management	110	31	28.2%
Luggage Carts	21	6	28.6%

Overall Weighted ACDBE Goal:

Using existing agreements and the above information for anticipated new agreements, the Authority has calculated a weighted ACDBE goal of 22% for the next three years. The base figure for the overall ACDBE goal was calculated by taking the ACDBE estimated annual value of \$21.3 million and dividing it by the total estimated annual value of \$99.9 million:

$$\begin{aligned} & \$21.9 \text{ million} \div \$99.9 \text{ million} = 21.9\% \\ & \text{Rounded to } 22\% \end{aligned}$$

The estimated ACDBE value is shown in **Table 12** below:

Table 12			
All Concessions Opportunities During the Goal Period			
CATEGORY	ESTIMATED AVERAGE ANNUAL VALUE (in millions)	ACDBE %	ACDBE VALUE (in millions)
Food & Beverage	\$56.9	21.8%	\$12.4
Merchandise	\$39.3	22.0%	\$8.6
Parking Management	\$.45	1.9%	\$0.01
Advertising	\$2.70	0%	\$0.06
Telecommunications	\$.09	12.9%	\$0.01
Business Services	\$.11	6.1%	\$0.01
Luggage Carts	\$.3	0%	\$0.0
Personal Services	\$.09	5.4%	\$0.0
TOTAL	\$99.9		\$21.9

STEP 2: ADJUSTMENTS

The Airport Authority compared its proposed goal to past performance and found it to be lower. Therefore, an upward adjustment of 2% is recommended which is in line with historical performance. The proposed overall ACDBE goal for the three year period commencing October 1, 2011 and ending September 30, 2014 is 24%.

Proposed Overall Three Year Goal for FFY 2012-2014 = 24%

SECTION II OVERALL ACDBE GOAL SETTING METHODOLOGY FOR CAR RENTAL

The Airport Authority currently has 16 car rental companies providing service to San Diego International Airport. All car rental companies operate via an agreement that does not provide property rights. All customer transactions are performed off the airport property. There are no counters located on airport property nor is there a ready return facility.

Per the definition of a concession found in 49 CFR Part 23.3, there are no on-airport car rental operators at SAN. Therefore, the car rental overall goal for the next three years is not applicable.

SECTION III UTILIZATION OF RACE-NEUTRAL & RACE CONSCIOUS METHODS

The Airport Authority has an existing agreement that has ACDBE participation as a result of race and gender conscious efforts. The remaining portion of this agreement will be in effect during the first 14 months of this 36 month goal period. Therefore, 8% of the 24% overall goal will be achieved using race and gender conscious means while the remaining 16% will be achieved using race and gender neutral means.

SECTION IV PUBLIC PARTICIPATION AND CONSULTATION

In accordance with consultation requirements of 49 CFR Part 23, stakeholders will be consulted to review the ACDBE goal setting methodology before submitting to the FAA for approval. Stakeholders shall include but are not limited to: minority and women business groups, community organizations, trade associations representing concessionaires currently located at airports, existing concessionaires, and other officials or organization which could be expected to have information concerning the availability of disadvantaged businesses, the effects of discrimination on opportunities for ACDBEs, and the Authority's efforts to increase participation of ACDBEs.

Written comments on the goal rationale should be addressed to:

San Diego County Regional Airport Authority
P.O. Box 82776,
San Diego, CA 92138-2776

Attention: R. Silvas, DBELO