

**PROPOSED ACDBE OVERALL CONCESSION GOALS**  
**Federal Fiscal Years 2025 - 2027**  
**The Greater Asheville Regional Airport Authority**  
**Asheville Regional Airport**

Airport Sponsor: The Greater Asheville Regional Airport Authority  
Airport: Asheville Regional Airport

Goal Period: From: October 1, 2025  
Thru: September 30, 2027

ACDBE Goal for Non-Car Rental Concessions: 1.1% (Race Conscious)  
FFY 2025 – 0.0%  
FFYs 2026-2027 – 1.6%

ACDBE Goal for Car Rental Concessions: 1.9% (Race Neutral)

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**Section 23.45: Separate Overall Goal Calculation for Concessions  
Other Than Car Rentals**

**Amount of Goal**

Asheville Regional Airport's ("AVL" or the "Airport") overall goal for concessions other than car rental during the period beginning October 1, 2024 and ending September 30, 2027 is 1.1%. Note that the goal for the three-year period is split between a goal for FFY 2025 and a different goal for FFY 2026-2027 when the ACDBE goal for Food/Beverage and Retail concessions becomes effective. 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 – 2027**

Total estimated gross receipts for all concessions excluding car rentals = \$88,859,443  
Estimated ACDBE gross receipts = \$990,302  
 $\$990,302/\$88,859,443 = 1.1\%$

**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. In the future, the Airport may elect to utilize a disparity study should one become available.

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.

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.

### **Asheville Regional Airport Non-Car Rental Concessions**

AVL ACDBE Goals for federal fiscal years 2025 – 2027 have been set for each concession contract as listed below and shown on the following chart. It should be noted that approximately 95% of the in-terminal non-car rental concession revenue is generated by the food/beverage and retail operation. An ACDBE goal of 5% was set for this operation beginning in FFY 2026. All other in-terminal non-car rental concessions combined generate less than 5% of the total in-terminal revenue.

**Food/Beverage/Retail** - The food/beverage/retail contract is operated by Paradies Lagardere and expires on February 28, 2047 (LTE was approved). The contract contains an ACDBE goal of 5.0% beginning in FFY 2026. The goal will be achieved through a joint venture arrangement effective in FFY 2026. Vending is currently included in the contract but will be a separate contract beginning in FFY 2026. This contract is being planned as a potential small business set-aside and therefore will not contain an ACDBE goal.

The following in-terminal concessions generated less than \$500,000 in gross revenues in FFY 2023. 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.

**ATM** – This concession is operated by Mountain Credit Union and generated approximately \$15,554 in FFY 2023. There is no ACDBE goal set for this contract. The contract expires in 2028, after this goal period expires. The contract will continue to term without an ACDBE Goal.

**Automated Eyeglass Cleaner** – This concession is currently operated by Optic Wash on a month-to-month contract pending further evaluation. FFY 2023 gross revenues for this operation were \$3,530. An ACDBE Goal has not been set for this concession due to the size and the fact that there are no subcontracting opportunities.

**Cell Phone Battery Vending** - This concession is currently operated by Fuel Rod and will expire in 2029. FFY 2023 gross revenues for this operation were \$529. An ACDBE

Goal has not been set for this concession due to the size and the fact that there are no subcontracting opportunities.

**Gas Station** – Marathon Gas Station is located on airport property and is operated under an Agreement that will expire in 2057. There is currently no ACDBE goal in the Agreement. When the Agreement expires, we will evaluate the opportunity to determine if a goal should be set. In the interim, we will work with the operator to encourage ACDBE participation in the purchase of goods/services.

Gross revenues for the AVL concessions have been projected using FFY 2023 as a base and assuming 5% annual growth for FFY 2024, 2025, 2026, and 2027 as shown below.

Asheville Regional Airport Projected Concession Gross Revenues Goal Period: October 1, 2025 - September 30, 2027 FFYs 2025, 2026, and 2027							
Concessionaire	Contract	2023	2024	2025	2026	2027	Total FFY 25 - 27
Paradies Lagardere	Food / Beverage/Retail	\$8,345,955	\$8,763,253	\$9,201,415			\$9,201,415
Paradies Lagardere@AVL	Food / Beverage/Retail				\$9,661,486	\$10,144,560	\$19,806,046
Paradies Lagardere (subcontract to Canteen)	Vending	\$451,611	\$474,192	\$497,901			\$497,901
New Tenant	Vending		\$0	\$0	\$522,796	\$548,936	\$1,071,732
Mountain Credit Union	ATM	\$15,554	\$16,332	\$17,148	\$18,006	\$18,906	\$54,060
Optic Wash	Automated eyeglass wash	\$3,530	\$3,707	\$3,892	\$4,086	\$4,291	\$12,269
Fuel Rod	Vending - Cell phone batteries	\$529	\$555	\$583	\$612	\$643	\$1,839
<b>Subtotal In-Terminal</b>		<b>\$8,817,179</b>	<b>\$9,258,038</b>	<b>\$9,720,940</b>	<b>\$10,206,986</b>	<b>\$10,717,336</b>	<b>\$30,645,262</b>
Marathon	Gas Station	\$16,749,240	\$17,586,702	\$18,466,037	\$19,389,339	\$20,358,806	\$58,214,182
<b>Total</b>		<b>\$25,566,419</b>	<b>\$26,844,740</b>	<b>\$28,186,977</b>	<b>\$29,596,325</b>	<b>\$31,076,141</b>	<b>\$88,859,443</b>

Based on the above, the base goal for AVL non-rental car concessions is shown below:

<b>Asheville Regional Airport</b>				
<b>ACDBE CONCESSION LEASING GOALS</b>				
<b>Goal Period: October 1, 2025 - September 30, 2027</b>				
<b>FFY 2025</b>				
<b>Company</b>	<b>Contract</b>	<b>FFY 2025 Gros Revenues</b>	<b>ACDBE \$</b>	<b>ACDBE %</b>
Paradies Lagardere	Food / Beverage/Retail	\$9,201,415		
Paradies Lagardere (subcontract to Canteen)	Vending	\$497,901		
Mountainside	ATM	\$17,148		
Optic Wash	Automated eyeglass wash	\$3,892		
Fuel Rod	Vending - Cell phone batteries	\$583		
<b>Subtotal In-Terminal</b>		<b>\$9,720,939</b>	<b>\$0</b>	<b>0.00%</b>
Marathon	Gas Station	\$18,466,037		
<b>Total 2025</b>		<b>\$28,186,976</b>	<b>\$0</b>	<b>0.00%</b>
<b>FFYs 2026-2027</b>				
Paradies Lagardere@AVL	Food / Beverage/Retail	\$19,806,046	\$990,302	5.0%
New Tenant	Vending	\$1,071,732		
Mountainside	ATM	\$36,912		
Optic Wash	Automated eyeglass wash	\$8,377		
Fuel Rod	Vending - Cell phone batteries	\$1,255		
<b>Subtotal In-Terminal</b>		<b>\$20,924,322</b>	<b>\$990,302</b>	<b>4.7%</b>
Marathon	Gas Station	\$39,748,145	\$0	0.00%
<b>Total 2026-2027</b>		<b>\$60,672,467</b>	<b>\$990,302</b>	<b>1.6%</b>
<b>Total 2025 - 2027</b>		<b>\$88,859,443</b>	<b>\$990,302</b>	<b>1.1%</b>

Given the above, we propose the base ACDBE goal for FFY 2025 at 0.0% and for FFYs 2026-2027 at 1.6%. The overall base goal for the three-year goal period is 1.1%.

**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	\$8,817,079	\$20,465	0.23%
2022	\$6,662,723	\$15,231	0.23%
2021	\$4,635,211	\$11,727	0.25%

We have elected not to adjust the goal for past history as the previous accomplishment did not include the gas station and the food/beverage/retail concession has been extended (LTE was approved) with a 5% ACDBE goal. Therefore, past history for this period is not relevant.

Therefore, the proposed overall ACDBE goal for the three-year period commencing October 1, 2025 and ending September 30, 2027 is 1.1% (0.0% for FFY 2025 and 1.6% for FFY 2026 and 2027).

### **Breakout of Estimated Race-Neutral & Race Conscious Participation**

The ACDBE contract goals reflected in this document have been set as race-conscious goals. There is one small contract that will become available near the end of FFY 2026 (vending). The Airport plans to use race-neutral methods to encourage participation in this contract and in other existing contracts 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. Establishing a business development program (see 49 CFR Part 26.35), technical assistance program, or taking other steps to foster ACDBE participation in concessions.
8. Implementing the Airport's Small Business element.

## **Overall Goal Calculation for Car Rentals (23.45)** **FFY 2022-2024**

### **Background**

Asheville Regional Airport currently has eight (8) different on-airport car rental brands owned by three (3) different companies. The current agreements will not expire during this three-year goal period. The ACDBE car rental goal developed herein will apply to the entire three-year goal period, including any new agreements. The goal has been developed based on the purchase of goods/services. Car rental concession revenues were approximately \$41.2 million in 2023. Total purchases for the same period were approximately \$7.8 million.

### **Goal Methodology**

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 three (3) 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 for other categories of goods typically purchased by car rental companies using national and/or regional contracts.

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## **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 are shown on the chart below. Both DBEs and ACDBEs from the

North Carolina DBE/ACDBE Directory have been included as any firm that meets the DBE eligibility requirements are potential ACDBEs.

<b>Table 1 – U.S. Census / North Carolina and National Unified Certification Program Directory</b>				
Description	NAICS	Census	Directory	DBE/ACDBE %
Door Maintenance/Repair	236220	1,137	75	6.60%
Concrete Maintenance	238110	711	62	8.72%
Electrical	238210	2,950	33	1.12%
HVAC Maintenance	238220	3,862	16	0.41%
Towing	488410	354	2	0.56%
Delivery Svc	492110	355	8	2.25%
Equipment Rental (GPS)	532210	240	0	0.00%
Security	561621	192	7	3.65%
Keys/Locks	561622	118	0	0.00%
Janitorial Services	561720	2,263	59	2.61%
Drug Testing	621999	232	8	3.45%
Auto Repair	811111	2,763	4	0.14%
Auto Body Repair	811121	1,006	3	0.30%
Windshield Repair	811122	214	0	0.00%
<b>Total Local</b>		<b>16,397</b>	<b>277</b>	<b>1.69%</b>
Printing/Signage	323111	15,430	334	2.16%
Fuel Maintenance (Changed to 457210)	454310	7,795	28	0.36%
GPS Devices	334511	503	7	1.39%
Auto Parts	423120	12,377	75	0.61%
Tires	423130	2,527	26	1.03%
Computer Support/Materials	423430	6,818	284	4.17%
Luggage Carts/Wheelchairs	423450	10,599	255	2.41%
Cleaning Supplies	423850	4,484	290	6.47%
Fire Safety/Suppression	423990	9,928	378	3.81%
Office Expense	424120	3,319	167	5.03%
First Aid	424210	9,959	69	0.69%
Fuel/Oil/Energy	424720	2,541	180	7.08%
Car Dealerships	441110	21,835	7	0.03%
Auto Transport	484230	11,976	598	4.99%
Insurance	524210	135,100	248	0.18%

<b>Table 1 – U.S. Census / North Carolina and National Unified Certification Program Directory</b>				
Description	NAICS	Census	Directory	DBE/ACDBE %
Legal Services	541110	166,972	235	0.14%
Accounting	541211	55,642	327	0.59%
Asset Recovery	561491	655	4	0.61%
Consulting	541611	97,678	7,484	7.66%
Background Checks	541612	8,958	1,355	15.13%
Uniforms	812331	839	17	2.03%
Total National		585,935	12,368	2.11%
Total		602,332	12,645	2.10%

The following contains weighted availability calculations based on information obtained from car rental companies surveyed in the past several years:

<b>Table 2 – Weighted ACDBE Availability (Based on Directory/Census)</b>				
Description	NAICS	% of \$ Expenditures (A)	DBE/ACDBE % (B) [From Table 1]	Weighted Availability (A X B)
Door Maintenance/Repair	236220	0.10%	6.60%	0.01%
Concrete Maintenance	238110	0.50%	8.72%	0.04%
Electrical	238210	0.10%	1.12%	0.00%
HVAC Maintenance	238220	0.00%	0.41%	0.00%
Towing	488410	0.10%	0.56%	0.00%
Delivery Svc	492110	0.00%	2.25%	0.00%
Equipment Rental (GPS)	532210	0.40%	0.00%	0.00%
Security	561621	0.00%	3.65%	0.00%
Keys/Locks	561622	0.00%	0.00%	0.00%
Janitorial Services	561720	0.10%	2.61%	0.00%
Drug Testing	621999	0.10%	3.45%	0.00%
Auto Repair	811111	0.30%	0.14%	0.00%
Auto Body Repair	811121	1.60%	0.30%	0.00%
Windshield Repair	811122	0.10%	0.00%	0.00%
Total Local		3.40%		0.06%
Printing/Signage	323111	0.30%	2.16%	0.01%
Fuel Maintenance	454310	0.00%	0.36%	0.00%

<b>Table 2 – Weighted ACDBE Availability (Based on Directory/Census)</b>				
Description	NAICS	% of \$ Expenditures (A)	DBE/ACDBE % (B) [From Table 1]	Weighted Availability (A X B)
GPS Devices	334511	0.00%	1.39%	0.00%
Auto Parts	423120	0.10%	0.61%	0.00%
Tires	423130	0.00%	1.03%	0.00%
Computer Support/Materials	423430	12.00%	4.17%	0.50%
Luggage Carts/Wheelchairs	423450	1.60%	2.41%	0.04%
Cleaning Supplies	423850	0.00%	6.47%	0.00%
Fire Safety/Suppression	423990	0.10%	3.81%	0.00%
Office Expense	424120	0.00%	5.03%	0.00%
First Aid	424210	2.10%	0.69%	0.01%
Fuel/Oil/Energy	424720	0.00%	7.08%	0.00%
Car Dealerships	441110	80.00%	0.03%	0.02%
Auto Transport	484230	0.10%	4.99%	0.00%
Insurance	524210	0.10%	0.18%	0.00%
Legal Services	541110	0.00%	0.14%	0.00%
Accounting	541211	0.00%	0.59%	0.00%
Asset Recovery	561491	0.00%	0.61%	0.00%
Consulting	541611	0.20%	7.66%	0.02%
Background Checks	541612	0.00%	15.13%	0.00%
Uniforms	812331	0.00%	2.03%	0.00%
<b>Total National</b>		<b>96.60%</b>		<b>0.61%</b>
<b>Total Purchases</b>		<b>100.00%</b>	<b>2.72%</b>	<b>0.67%</b>

**We therefore propose the base goal at 0.67%.**

**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 period is as follows:

Actual Past History of ACDBE Participation			
YEAR	TOTAL Purchases	ACDBE Purchases	ACDBE %
2023	\$7,812,392	\$323,895	4.15%
2022	\$9,863,039	\$301,793	3.06%
2021	\$17,678,886	\$498,576	2.82%

Adjusting the base goal for past history results in the following:

$$\begin{aligned} \text{Base Goal (0.67\%)} + \text{Median Past History (3.06\%)} &= 3.73\% \\ 3.73\% \div 2 &= 1.9\% \end{aligned}$$

**We, therefore, propose the adjusted Car Rental ACDBE Goal at 1.9%.**

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

The current car rental agreements include a race conscious ACDBE goal which can be adjusted based on the overall goal for each three-year period. Therefore, the goal will be set as race-conscious.