

Attachment 4

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

Amount of Goal

Name of Recipient: Ontario International Airport Authority (OIAA)

Goal Period: FY 2018-2019-2020 (October 1, 2017 through September 30, 2020)

Overall Three-Year Goal:

17.5%, to be accomplished through 11.5% RC and 6% RN

Market Area for Non-Car Rental Concessionaires

The OIAA has determined the market area is as follows: San Bernardino County, Riverside County, Orange County, and Los Angeles County. 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 the OIAA considered the previous 3 years of gross concession receipts and the projected potential concession revenue (gross receipts) three years into the future including upcoming new opportunities.

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

Fiscal Year	Concessions Revenue (Excluding Car Rental)
2014	\$12,382,924
2015	\$9,840,375
2016	\$10,864,360
Total	\$33,087,659
Average	\$11,029,220

The OIAA estimates that revenues to existing concessions will grow by 5% over the next three years due to new lease agreements with Delaware North Corporation, Hudson Group, and Lamar. The new agreement with Delaware North will make a six-million dollar (\$6,000,000.00) initial investment for the complete rebranding and refurbishment of concessions which will generate an estimated \$1,188,000.00 in *net revenue*. Hudson Group will invest over \$2.4 million to open new and rebrand existing stores in T2 and T4 and predicts first year *gross sales* to be \$8,000,000. Both companies have pledged to deliver ACDBE participation of 20% (DNC) and 12% (Hudson Group). Lamar projects that during their 10-year term, they will invest \$630,000 in brand new digital advertising, which will generate \$11.5 million in gross revenue for ONT.

The table below, provided by DNC, lists ONT's actual food & beverage revenue to date and projected revenue through 2027 based on DNC's projections and other assumptions as indicated. These projections are believed to be conservative as they rely on conservative assumptions of passenger growth provided by the FAA. On November 1, 2016, ownership of the Ontario International Airport transferred from Los Angeles World Airports (LAWA) to the Ontario International Airport Authority (OIAA). With the change to local ownership, greater focus on airport and airline market development and yield higher passenger growth than what is currently forecast by the FAA's Terminal Area Forecast (TAF).

	Year	Enplane-ments*	Total Food & Beverage Revenue (\$000s)	DNC Revenue (\$000s)*	SSP (Carls Jr.) Revenue (\$000s)***	Net to OIAA F&B \$ per enplanemen t
	2014	2,013,354	\$735			\$0.37
	2015	2,062,768	\$651			\$0.32
Unaudite d	2016	2,087,291	\$692			\$0.33
Budgeted	2017	2,212,830	\$769			\$0.35
Projected	2018	2,268,636	\$1,331	\$1,188	\$143	\$0.59
	2019	2,319,578	\$1,377	\$1,230	\$147	\$0.59
	2020	2,370,513	\$1,425	\$1,273	\$153	\$0.60
	2021	2,419,620	\$1,475	\$1,317	\$158	\$0.61
	2022	2,467,956	\$1,527	\$1,363	\$164	\$0.62
	2023	2,516,176	\$1,580	\$1,411	\$169	\$0.63
	2024	2,562,898	\$1,636	\$1,460	\$175	\$0.64
	2025	2,611,318	\$1,693	\$1,511	\$181	\$0.65
	2026	2,663,586	\$1,752	\$1,564	\$188	\$0.66
	2027	2,715,824	\$1,813	\$1,619	\$194	\$0.67

* Source: 2016 FAA Terminal Area Forecast; 2016 and future years are forecast.

** DNC estimated OIAA would net \$1,188,000 in the first full year of a new contract with DNC, increasing by approximately 3.5% annually. This estimate is based on DNC's original proposal to OIAA, which has been modified as a result of subsequent negotiations. DNC's proposal does not include revenue from Carls Jr., currently operated by SSP.

*** Assumes that SSP will continue to operate a concession similar to Carls Jr. or that DNC will incorporate this concession into its operations post-November 2018. Assumes that SSP's MAG of \$143,000 is increased by 3.5% annually.

The five percent anticipated growth in revenue means that the OIAA can expect an average annual concessions revenue of \$11,580,680 in gross receipts over the next three years (see calculation below).

Calculation:

$$\begin{aligned} \$11,029,219.70 \times 5\% &= \$551,461 \\ \$551,460.99 + \$11,029,219.70 &= \mathbf{\$11,580,681} \\ \text{Base of goal: } &\mathbf{\$11,580,681} \end{aligned}$$

The following are not included in the total gross receipts for concessions: (a) the gross receipts of car rental operations, (b) the dollar amount of a management contract or subcontract with a non-ACDBE, (c) the gross receipts of business activities to which a management contract or

subcontract with a non-ACDBE pertains, and (d) any portion of a firm's estimated gross receipts that will not be generated from a concession.

If a new concession opportunity arises prior to the end of this goal period and the estimated average of annual gross revenues are anticipated to be \$200,000 or greater, the OIAA 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

The OIAA can meet the percentage goal by including the purchase from ACDBEs of goods and services used in businesses conducted at the airport. The OIAA and the businesses at ONT, shall make good faith efforts to explore all available options to achieve, to the maximum extent practicable, compliance with the goal through direct ownership arrangements, including joint ventures and franchises.

Management Contract or Subcontract

The OIAA can meet the percentage goal by including any business operated through a management contract or subcontract with an ACDBE. The OIAA and the businesses at ONT, will add the dollar amount of a management contract or subcontract with an ACDBE to the total participation by ACDBEs in airport concessions 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. *While we realize that this appears to go against the normal rules and rationale for goal-setting, we understand that this method is nevertheless required by statute.*

Step 1: 23.51(c)

CFR Part 23.51 recommends several methodologies for determining a base ACDBE goal based on relative availability of ACDBEs. The recommendations and examples are provided as a starting point but are not intended as an exhaustive list. Other methods or combinations of methods may be used subject to FAA approval.

Since there was *no Active Participant's list*, and no disparity study for ONT, the base figure for the relative availability of DBEs was calculated through an analysis of the State of California DBE directory and Census Bureau County Business Patterns in the market area counties, historical participation, as well as a comparison of goals at airports in the region.

The 2015 U.S. Census County Business Patterns by NAICS classifications for San Bernardino County, Los Angeles County, Orange County and Riverside County were compared to the number of firms certified as ACDBEs by the California UCP to arrive at the base percentage.

The result of these calculations yields a base goal of 1.1%.

NAICS Code	Meaning of NAICS code	San Bernardino County ACDBE Certified Firms	Total San Bernardino Establishments	Riverside County ACDBE Certified Firms	Total Riverside Establishments	Orange County ACDBE Certified Firms	Total Orange Establishments	Los Angeles County ACDBE-Certified Firms	Total Los Angeles Establishments	TOTAL ACDBE FIRMS LOCATED IN MARKET	TOTAL FIRMS	Percent DBE
311811	Retail bakeries	0	28	2	37	1	100	3	368	6	533	1.1%
445291	Baked goods stores	0	17	0	14	1	38	1	149	2	218	0.9%
445292	Confectionery and nut stores	1	21	2	24	2	43	2	116	7	204	3.4%
446120	Cosmetics, beauty supplies, and perfume stores	2	89	0	92	0	220	0	714	2	1,115	0.2%
446199	All other health and personal care stores	0	46	0	50	0	123	0	229	0	448	0.0%
448110	Men's clothing stores	1	31	2	41	3	73	3	266	9	411	2.2%
448120	Women's clothing stores	2	127	2	188	2	388	0	1297	6	2,000	0.3%
448190	Other clothing stores	0	50	0	62	0	134	0	365	0	611	0.0%
448310	Jewelry stores	2	90	2	114	3	255	4	939	11	1,398	0.8%
448320	Luggage and leather goods stores	1	5	1	6	2	12	2	56	6	79	7.6%
451212	News dealers and newsstands	11	2	13	1	16	6	19	34	59	43	137.2%
452990	All other general merchandise stores	3	152	3	138	2	162	3	661	11	1,113	1.0%
453110	Florists	0	41	0	59	0	110	0	305	0	515	0.0%
453210	Office supplies and stationery stores	0	34	0	39	0	76	0	229	0	378	0.0%
453220	Gift, novelty, and souvenir stores	22	86	24	86	27	211	35	595	108	978	11.0%
454210	Vending machine operators	1	12	1	15	1	22	2	62	5	111	4.5%
485999	All other transit and ground passenger transportation	1	9	2	10	1	18	3	94	7	131	5.3%
517919	All other telecommunications	0	19	0	17	0	48	0	145	0	229	0.0%
519130	Internet publishing and broadcasting and web search portals	0	12	8	23	0	141	0	500	8	676	1.2%
522320	Financial transactions processing, reserve, and clearinghouse activities	0	28	1	22	0	100	0	274	1	424	0.2%
541613	Marketing consulting services	2	123	1	183	1	1009	2	1961	6	3,276	0.2%
541810	Advertising agencies	0	30	0	39	0	241	0	733	0	1,043	0.0%
541890	Other services related to advertising	0	23	1	33	0	112	1	201	2	369	0.5%
561720	Janitorial services	0	207	0	291	0	489	0	1077	0	2,064	0.0%
722310	Food service contractors	7	42	7	39	8	144	10	465	32	690	4.6%
722320	Caterers	1	21	1	53	1	126	4	449	7	649	1.1%
722410	Drinking places (alcoholic beverages)	7	99	8	90	8	228	9	720	32	1,137	2.8%
722511	Full-service restaurants	11	1063	11	1185	14	2718	18	7957	54	12,923	0.4%
722515	Snack and nonalcoholic beverage bars	8	319	9	380	9	931	13	2654	39	4,284	0.9%
812113	Nail salons	0	181	0	168	0	323	0	1154	0	1,826	0.0%
TOTAL:										420	39,876	1.1%

Source:Source: U.S. Census Bureau, 2015 County Business Patterns. Data in this table represent those available when this report was created; data may not be available for all NAICS industries or geographies. Excludes most government employees, railroad employees, and self-employed persons.

The total certified DBE firms in a particular county may include firms who possess an interstate certification, meaning they may be physically located in another state yet have expressed an interest in doing business in California, thus obtaining a California DBE certification. For example, a DBE firm located in New York City can register to do business in San Bernardino County. This often times, can exceed total firms by NAICS code because the Census Bureau only takes into consideration firms that have a physical address in a specific county.

While there is a presumption that the market area is the area in which it is expected that the substantial majority of the Airport's concessions that seek to do business with the Airport **are located**, data from the State of California was further analyzed to assess DBE firms physically located in the market (San Bernardino, Riverside, Orange, and Los Angeles counties). This

analysis, however, yielded so few results that these numbers were not used in calculating the base goal (see table below).

NAICS Code	Meaning of NAICS code	San Bernardino County ACDBE Certified & Located in County	Riverside County ACDBE Certified & Located in County	Orange County ACDBE Certified & Located in County	Los Angeles County ACDBE Certified and Located in County
311811	Retail bakeries	0	0	0	2
445291	Baked goods stores	0	0	0	0
445292	Confectionery and nut stores	0	0	2	0
446120	Cosmetics, beauty supplies, and perfume stores	0	0	0	0
446199	All other health and personal care stores	0	0	0	0
448110	Men's clothing stores	0	0	1	1
448120	Women's clothing stores	0	0	1	0
448190	Other clothing stores	0	0	0	0
448310	Jewelry stores	0	0	0	1
448320	Luggage and leather goods stores	0	0	0	0
451212	News dealers and newsstands	0	0	0	9
452990	All other general merchandise stores	0	0	0	1
453110	Florists	0	0	0	0
453210	Office supplies and stationery stores	0	0	0	0
453220	Gift, novelty, and souvenir stores	0	0	1	13
454210	Vending machine operators	0	0	0	1
485999	All other transit and ground passenger transportation	0	0	0	0
517919	All other telecommunications	0	0	0	0
519130	Internet publishing and broadcasting and web search portals	0	0	0	0
522320	Financial transactions processing, reserve, and clearinghouse activities	0	0	0	0
541613	Marketing consulting services	0	0	0	0
541810	Advertising agencies	0	0	0	0
541890	Other services related to advertising	0	0	0	0
561720	Janitorial services	0	0	0	0
722310	Food service contractors	0	0	1	0
722320	Caterers	0	0	0	0
722410	Drinking places (alcoholic beverages)	0	0	0	3
722511	Full-service restaurants	0	0	1	2
722515	Snack and nonalcoholic beverage bars	0	0	0	4
812113	Nail salons	0	0	0	0

Source:Source:State of California DBE directory

Step 2: 23.51(d)

After calculating a base figure of the relative availability of ACDBEs, The OIAA examined evidence to determine what adjustment was needed to the Step 1 base figure to arrive at the overall goal.

Past History Participation

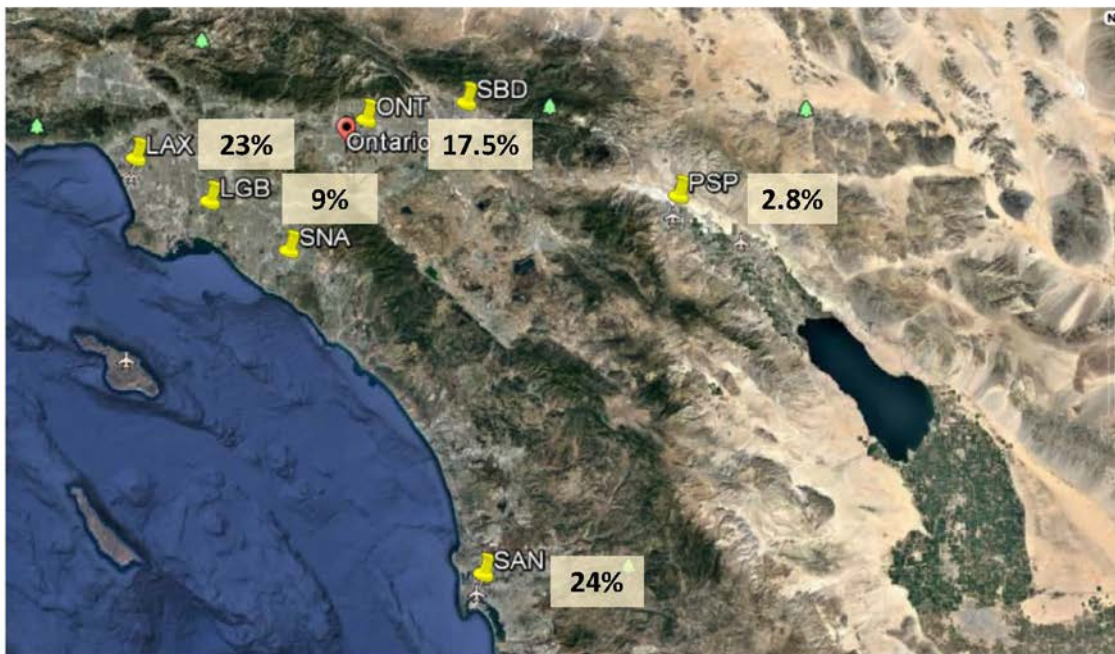
Data used to determine the adjustment to the base figure was the median of historical ACDBE accomplishments

FY	ACDBE Goals			Accomplishments		
	RC	RN	Total	RC	RN	Total
2012	23.10%	0%	23.10%	10.25%	4.45%	14.70%
2013	23.10%	0%	23.10%	11.37%	3.69%	15.06%
2014	14.00%	0%	14.00%	33.88%	0%	33.88%
2015	13.20%	0%	13.20%	23.62%	10.84%	34.45%
2016	13.20%	0%	13.20%	27.74%	11.59%	36.34%

Arranging this historical data from low to high, the median is 34%.

To arrive at an overall goal, we added our Step 1 base figure with our Step 2 adjustment figure and then averaged the total arriving at an **overall goal of 17.5%**. We feel this adjusted goal figure will accurately reflect ACDBE non-car rental concession participation that can be achieved during this 3-year period. This is in line with the DBE goals of other airports in the region, as depicted in the graphic below.

Comparing ONT ACDBE Overall Goal to other Airport ACDBE Goals in Region



PUBLIC PARTICIPATION

Consultation: Section 23.43.

PUBLIC PARTICIPATION

In accordance with Public Participation Regulatory Requirements of 49 CFR Part 23, the OIAA will take the following steps to inform and consult with the public to satisfy the component of public participation required for goal setting: 1) Compile a distribution list that includes minority and women’s business groups, community organizations, trade associations representing concessionaires currently located at the airport, as well as existing concessionaires, officials or organizations that could be expected to have information concerning the availability of disadvantaged businesses, the effects of discrimination on opportunities for ACDBEs, groups within the market that are likely to have information relevant to the goal setting process or that have a stake in the outcome of the process, 2) Publish a draft copy of the ACDBE program on www.flyontario.com for a 30 day review by the public and issue a public notice to those specifically on the distribution list, and publish the notice in minority-focused media, 3) Hold a public meeting with as many stakeholders as possible aimed at obtaining information that will

help to establish the overall ACDBE goal. Efforts will be made to engage in a dialogue with as many interested stakeholders as possible.

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

The OIAA will meet the maximum feasible portion of its overall goal by using race-neutral means of facilitating ACDBE participation. The OIAA uses the following race-neutral measures and understands that its personnel are expected to take these steps:

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. Ensuring that competitors for concession opportunities are informed during pre-solicitation meetings about how the sponsor's ACDBE program will affect the procurement process;
4. Providing information concerning the availability of ACDBE firms to competitors to assist them in obtaining ACDBE participation; and

In FY-2012 and FY-2013, ONT did not achieve its ACDBE goals (see table below). Between FY-2014 and FY 2016, ONT exceeded its ACDBE goals by approximately 20% (see table below). This is evidence of race-neutral participation. Taking the average of the five previous year's race-neutral achievements, 6% of our goal is being applied to race-neutral and the remaining 11.5% is applied to race-conscious participation.

FY	ACDBE Goals			Accomplishments		
	RC	RN	Total	RC	RN	Total
2012	23.10%	0%	23.10%	10.25%	4.45%	14.70%
2013	23.10%	0%	23.10%	11.37%	3.69%	15.06%
2014	14.00%	0%	14.00%	33.88%	0%	33.88%
2015	13.20%	0%	13.20%	23.62%	10.84%	34.45%
2016	13.20%	0%	13.20%	27.74%	11.59%	36.34%

We estimate that, in meeting our overall goal of 17.5%, we will obtain 6% from race-neutral participation and 11.5% through race-conscious measures.

In working towards achieving the overall OIAA ACDBE goal, the OIAA will also establish concession-specific goals for concession opportunities, as evidenced by the two new concessions leases that have recently been negotiated. Both DNC and Hudson Group have pledged to deliver ACDBE goals of 20% (DNC) and 12% (Hudson Group).

In using concession specific goals the OIAA will adjust the estimated breakout of race-neutral and race-conscious participation as needed to reflect actual ACDBE participation (see 26.51(f)) and will track and report race-neutral and race conscious 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.

The OIAA will maintain data separately on ACDBE achievements in those contracts with and without concession specific goals, respectively.

Attachment 5

Section 23.45: Overall Goal Calculation for Car Rentals

Amount of Goal

Name of Recipient: Ontario International Airport Authority (OIAA)

Goal Period: FY 2018-2019-2020 (October 1, 2017 through September 30, 2020)

Overall Three-Year Goal:

3.5%, to be accomplished through 3.5% RC and 0% RN

Market Area for Car Rentals

The OIAA has determined the market area is as follows: San Bernardino County, Riverside County, Orange County, and Los Angeles County. 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 the OIAA considered the previous 3 years of gross car rentals receipts and the projected potential car rentals revenue (gross receipts) three years into the future including upcoming new opportunities.

Gross Receipts (Revenue) for Previous 3 Years - Car Rentals

Fiscal Year	Car Rental Revenue
2014	\$70,334,615
2015	\$69,495,701
2016	\$78,509,691
Total	\$218,340,000
Average	\$72,780,000

The OIAA estimates that revenues to existing car rentals will grow by 2% over the next three years due to *inflation and increased passenger traffic*. On November 1, 2016, ownership of the Ontario International Airport transferred from Los Angeles World Airports (LAWA) to the Ontario International Airport Authority (OIAA). With the change to local ownership, greater focus on airport and airline market development should yield higher passenger growth than what is currently forecast by the FAA's Terminal Area Forecast (TAF), however, with the addition of share-riding companies, Uber and Lyft, the airport will need to spend time evaluating its impacts to car rental companies.

The two percent anticipated growth in revenue means that the OIAA can expect an average annual concessions revenue of \$74,235,600 in gross receipts over the next three years (see calculation below).

Calculation:

$$\begin{aligned}
 & \$72,780,000.00 \times 2\% = \$1,455,600 \\
 & \$1,455,600.00 + \$72,780,000.00 = \$74,235,600 \\
 & \text{Base of goal: } \mathbf{\$ 74,235,600}
 \end{aligned}$$

If a new 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 OIAA 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 opportunity. (23.45(i)).

Methodology used to Calculate Overall Goal

Goods and Services

The OIAA can meet the percentage goal by including the purchase from ACDBEs of goods and services used in businesses conducted at the airport. The OIAA and the businesses at ONT, shall make good faith efforts to explore all available options to achieve, to the maximum extent practicable, compliance with the goal through direct ownership arrangements, including joint ventures and franchises.

Step 1: 23.51(c)

CFR Part 23.51 recommends several methodologies for determining a base ACDBE goal based on relative availability of ACDBEs. The recommendations and examples are provided as a starting point but are not intended as an exhaustive list. Other methods or combinations of methods may be used subject to FAA approval.

Since there was *no Active Participant's list*, and no disparity study for ONT, the base figure for the relative availability of DBEs was calculated through an analysis the State of California DBE directory and Census Bureau County Business Patterns in the market area counties, historical participation, as well as a comparison of goals at airports in the region.

The 2015 U.S. Census County Business Patterns by NAICS classifications for San Bernardino County, Los Angeles County, Orange County and Riverside County were compared to the number of car rentals certified as DBEs by the California UCP to arrive at the base percentage.

The result of these calculations yields a base goal of 0.2%.

NAICS Code	Meaning of NAICS Code	San Bernardino County ACDBE Certified Firms	Total San Bernardino Establishments	Riverside County ACDBE Certified Firms	Total Riverside Establishments	Orange County ACDBE Certified Firms	Total Orange Establishments	Los Angeles County ACDBE-Certified Firms	Total Los Angeles Establishments	TOTAL ACDBE FIRMS LOCATED IN MARKET	TOTAL FIRMS	Percent DBE
532111	Passenger Car Rental	0	53	0	46	0	127	1	354	1	580	0.2%
532112	Passenger Car Leasing	0	2	0	1	0	6	1	13	1	22	4.5%
532120	Truck, utility trailer, and RV rental & leasing	0	36	0	32	0	35	0	140	0	243	0.0%
TOTAL										2	845	0.2%

Source: U.S. Census Bureau, 2015 County Business Patterns. Data in this table represent those available when this report was created; data may not be available for all NAICS industries or geographies. Excludes most government employees, railroad employees, and self-employed persons; and State of California DBE directory

The total certified DBE firms in a particular county may include firms who possess an interstate certification, meaning they may be physically located in another state yet have expressed an interest in doing business in California, thus obtaining a California DBE certification. For example, a DBE firm located in New York City can register to do business in San Bernardino County. This often times can exceed total firms by NAICS code because the Census Bureau only takes into consideration firms that have a physical address in a specific county.

While there is a presumption that the market area is the area in which it is expected that the substantial majority of the Airport's concessions that seek to do business with the Airport **are located**, data from the State of California was further analyzed to assess DBE firms physically located in the market (San Bernardino, Riverside, Orange, and Los Angeles counties). This analysis, however, yielded **two results** from the State of California DBE directory, therefore, these numbers were not used in calculating the base goal.

Step 2: 23.51(d)

After calculating a base figure of the relative availability of ACDBEs, the OIAA examined evidence to determine what adjustment was needed to the Step 1 base figure to arrive at the overall goal.

Past History Participation

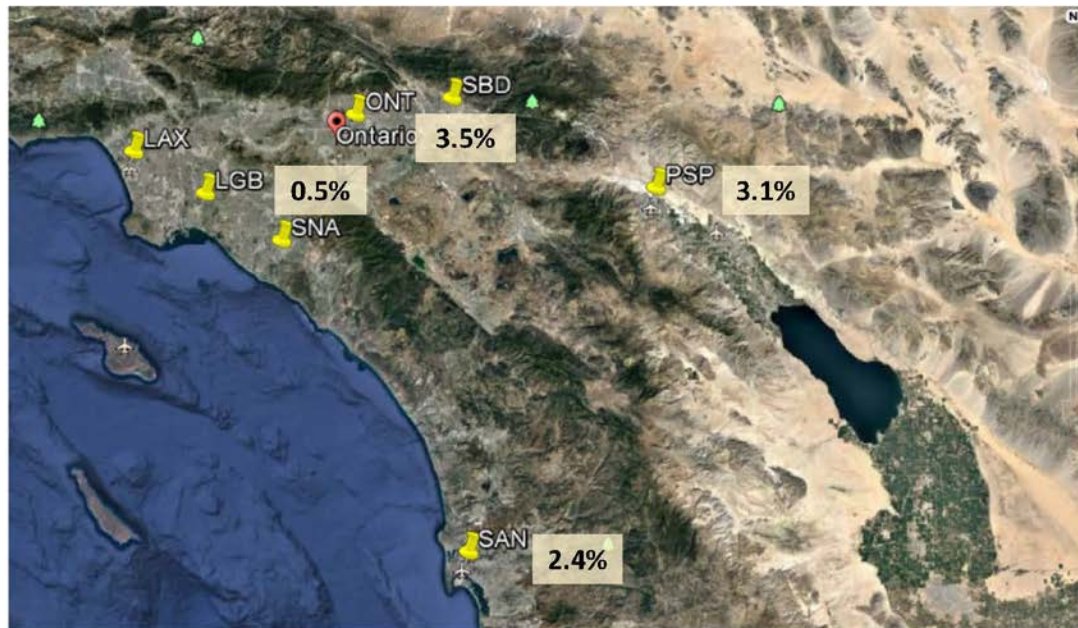
Data used to determine the adjustment to the base figure was the median of historical ACDBE accomplishments

Fiscal Year	ACDBE Goals			Accomplishments		
	RC	RN	Total	RC	RN	Total
2012	0	0	0	1.46	0	1.46
2013	1.00	0	1.00	1.46	0	1.46
2014	1.50	0	1.50	1.36	0	1.36
2015	3.50	0	3.50	8.25%	0	8.25%
2016	3.50%	0	3.50%	5.63%	0	5.63%

Arranging this historical data from low to high, the median is 1.36%.

Querying the US Census and California UCP resulted in a close to zero percent base, therefore, to arrive at an overall goal, the OIAA looked at the average goal accomplishments from the historical data above, arriving at an **overall goal of 3.5%**. The OIAA feels this adjusted goal figure will accurately reflect ACDBE car rental participation that can be achieved during this 3-year period. This is in line with the DBE goals of other airports in the region, as depicted in the graphic below.

Comparing ONT Car Rental Goal to other Airport Car Rental Goals in Region



PUBLIC PARTICIPATION

Consultation: Section 23.43.

In accordance with Public Participation Regulatory Requirements of 49 CFR Part 23, the OIAA will take the following steps to inform and consult with the public to satisfy the component of public participation required for goal setting: 1) Compile a distribution list that includes minority and women’s business groups, community organizations, trade associations representing concessionaires currently located at the airport, as well as existing concessionaires, officials or organizations that could be expected to have information concerning the availability of disadvantaged businesses, the effects of discrimination on opportunities for ACDBEs, groups within the market that are likely to have information relevant to the goal setting process or that have a stake in the outcome of the process, 2) Publish a draft copy of the ACDBE program on www.flyontario.com for a 30 day review by the public and issue a public notice to those specifically on the distribution list, and publish the notice in minority-focused media, 3) Hold a public meeting with as many stakeholders as possible aimed at obtaining information that will help to establish the overall ACDBE goal. Efforts should be made to engage in a dialogue with as many interested stakeholders as possible.

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

The OIAA will meet the maximum feasible portion of its overall goal by using race-neutral means of facilitating ACDBE participation. The OIAA uses the following race-neutral measures and understands that its personnel are expected to take these steps:

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. Ensuring that competitors for concession opportunities are informed during pre-solicitation meetings about how the sponsor’s ACDBE program will affect the procurement process; and
4. Providing information concerning the availability of ACDBE firms to competitors to assist them in obtaining ACDBE participation.

Between FY-2012 and FY-2016, ONT exceeded its ACDBE goals slightly, by approximately 1.5% (see table below). However, there was no recorded race-neutral participation, and therefore ***the OIAA is applying its entire goal of 3.5% to race-conscious participation.***

Fiscal Year	ACDBE Goals			Accomplishments		
	RC	RN	Total	RC	RN	Total
2012	0	0	0	1.46	0	1.46
2013	1.00	0	1.00	1.46	0	1.46
2014	1.50	0	1.50	1.36	0	1.36
2015	3.50	0	3.50	8.25%	0	8.25%
2016	3.50%	0	3.50%	5.63%	0	5.63%

In working towards achieving the overall OIAA ACDBE goal, the OIAA will also establish concession-specific goals for concession opportunities, as evidenced by the two new concessions leases that have recently been negotiated. Both DNC and Hudson Group have pledged to deliver ACDBE goals of 20% (DNC) and 12% (Hudson Group).

In using concession specific goals the OIAA will adjust the estimated breakout of race-neutral and race-conscious participation as needed to reflect actual ACDBE participation (see 26.51(f)) and will track and report race-neutral and race conscious 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.

The OIAA will maintain data separately on ACDBE achievements in those contracts with and without concession specific goals, respectively.