



**Rhode Island Airport Corporation**

**AIRPORT CONCESSIONS  
DISADVANTAGED BUSINESS  
ENTERPRISE PLAN**

**2022 - 2024**

**RHODE ISLAND T. F. GREEN  
INTERNATIONAL AIRPORT (PVD)  
WARWICK, RHODE ISLAND  
Small Hub Primary Airport**

## POLICY STATEMENT

### **Section 23.1, 23.23 Objectives/Policy Statement**

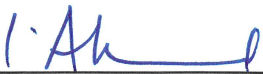
The Rhode Island Airport Corporation (RIAC) has established an Airport Concession Disadvantaged Business Enterprise (ACDBE) program in accordance with regulations of the U.S. Department of Transportation (DOT), 49 CFR Part 23. RIAC is a primary airport and has received federal funds authorized for airport development after January 1988 (authorized under Title 49 of the United States Code). RIAC has signed airport grant assurances that it will comply with 49 CFR Part 23.

It is the policy of RIAC to ensure that ACDBEs as defined in Part 23, have an equal opportunity to receive and participate in concession opportunities. It is also our policy:

1. To ensure nondiscrimination in the award and administration of opportunities for concessions by Rhode Island T. F. Green International Airport (PVD);
2. To create a level playing field on which ACDBEs can compete fairly for opportunities for concessions;
3. To ensure that our ACDBE program is narrowly tailored in accordance with applicable law;
4. To ensure that only firms that fully meet this part's eligibility standards are permitted to participate as ACDBEs at our airport(s);
5. To help remove barriers to the participation of ACDBEs in opportunities for concessions at our airport(s); and
6. To provide appropriate flexibility to our airports in establishing and providing opportunities for ACDBEs.

Mr. Shahzad Sadozai, RIAC's Assistant Chief Financial Officer, has been delegated as the ACDBE Liaison Officer (ACDBELO). In that capacity, Shahzad Sadozai is responsible for implementing all aspects of the ACDBE program. Implementation of the ACDBE program is accorded the same priority as compliance with all other legal obligations incurred by RIAC in its financial assistance agreements with the Department of Transportation.

RIAC will disseminate this policy statement to the RIAC Board of Directors and all the components of the organization. Where appropriate, RIAC will obtain, maintain, and update a list of ACDBE concessionaires; publish notice of this policy; hold future ACDBE participation workshops; work with prime contractors to identify ACDBE participation opportunities in appropriate trades; and will otherwise distribute this policy statement to ACDBE and non-ACDBE concessionaires for RIAC on USDOT-assisted contracts.

  
Iftikhar Ahmad  
President and CEO

  
Date

## **SUBPART A – GENERAL REQUIREMENTS**

### **Section 23.1 Objectives**

The objectives are found in the policy statement on the first page of this program.

### **Section 23.3 Definitions**

RIAC will use terms in this program that have the meaning defined in Section 23.3 and Part 26 Section 26.5 where applicable.

### **Section 23.5 Applicability**

RIAC is a primary airport and the sponsor of federal airport funds authorized for airport development after January 1988 that was authorized under Title 49 of the United States Code.

### **Section 23.9 Non-discrimination Requirements**

RIAC will never exclude any person from participation in, deny any person the benefits of, or otherwise discriminate against anyone in connection with the award and performance of any concession agreement, management contract or subcontract, purchase or lease agreement or other agreement covered by 49 CFR Part 23 on the basis of race, color, sex, or national origin.

In administering its ACDBE program, RIAC will not, directly or through contractual or other arrangements, use criteria or methods of administration that have the effect of defeating or substantially impairing accomplishment of the objectives of the ACDBE program with respect to individuals of a particular race, color, sex, or national origin.

RIAC acknowledges these representations are also in accordance with obligations contained in its Civil Rights, ACDBE and ACDBE Airport grant assurances.

RIAC will include the following assurances in all concession agreements and management contracts it executes with any firm:

- (1) This agreement is subject to the requirements of the U.S. Department of Transportation's regulations, 49 CFR Part 23. The concessionaire or contractor agrees that it will not discriminate against any business owner because of the owner's race, color, national origin, or sex in connection with the award or performance of any concession agreement, management contract, or subcontract, purchase or lease agreement, or other agreement covered by 49 CFR Part 23.
- (2) The concessionaire or contractor agrees to include the above statements in any subsequent concession agreement or contract covered by 49 CFR Part 23, that it enters and cause those businesses to similarly include the statements in further agreements.

### **Section 23.11 Compliance and Enforcement**

RIAC will comply with and is subject to the provisions of 49 CFR Part 26 (§§ 26.101 and 26.105 through 26.107).

RIAC will comply with this part or be subject to formal enforcement action under §26.105 or appropriate program sanctions, such as the suspension or termination of Federal funds, or refusal to approve projects, grants or contracts until deficiencies are remedied. Program sanctions may include actions consistent with 49 U.S.C. 47106(d), 47111(d), and 47122.

RIAC's compliance with all requirements of this part is enforced through the procedures of Title 49 of the United States Code, including 49 U.S.C. 47106(d), 47111(d), and 47122, and regulations implementing them.

The FAA may review the airport sponsor's compliance with this part at any time, including but not limited to, reviews of paperwork, on-site reviews, and review of the airport sponsor's monitoring and enforcement mechanism, as appropriate. The FAA Office of Civil Rights may initiate a compliance review based on complaints received.

Any person who knows of a violation of this part by RIAC may file a complaint under 14 CFR part 16 with the Federal Aviation Administration Office of Chief Counsel.

The following enforcement actions apply to firms participating in RIAC's ACDBE program:

- (a) For a firm that does not meet the eligibility criteria of subpart C of this part and that attempts to participate as an ACDBE on the basis of false, fraudulent, or deceitful statements or representations or under circumstances indicating a serious lack of business integrity or honesty, the Department of Transportation (DOT) or the Federal Aviation Administration (FAA) may initiate suspension or debarment proceedings against the firm under 49 CFR part 29.
- (b) For a firm that, in order to meet ACDBE goals or other ACDBE program requirements, uses or attempts to use, on the basis of false, fraudulent or deceitful statements or representations or under circumstances indicating a serious lack of business integrity or honesty, another firm that does not meet the eligibility criteria of subpart C of this part, DOT or FAA may initiate suspension or debarment proceedings against the firm under 49 CFR part 29.
- (c) In a suspension or debarment proceeding brought under paragraph (a) or (b) of this section, the FAA may consider the fact that a purported ACDBE has been certified. However, such certification does not preclude DOT from determining that the purported ACDBE, or another firm that has used or attempted to use it to meet ACDBE goals, should be suspended or debarred.
- (d) DOT may take enforcement action under 49 CFR Part 31, Program Fraud and Civil Remedies, against any participant in the ACDBE program whose conduct is subject to such action under 49 CFR part 31.
- (e) DOT may refer to the Department of Justice, for prosecution under 18 U.S.C. 1001 or other applicable provisions of law, any person who makes a false or fraudulent statement in connection with participation of an ACDBE in RIAC's ACDBE program or otherwise violates applicable Federal statutes.

## **SUBPART B – ACDBE Programs**

### **Section 23.21 ACDBE Program Updates**

RIAC is a small hub primary airport required to have an ACDBE program. As a condition of eligibility for FAA financial assistance, RIAC will submit its ACDBE program and overall goals to the FAA according to 23.45 of this section.

Until RIAC's new ACDBE program is submitted and approved we will continue to implement our ACDBE program that was in effect previously, except with respect to any provision that is contrary to 49 CFR Part 23.

This ACDBE program will be implemented at Rhode Island T. F. Green International Airport located in Warwick, RI.

When RIAC makes significant changes to its ACDBE program, we will provide the amended program to the FAA for approval prior to implementing the changes.

### **Section 23.23 Administrative Provisions**

**Policy Statement:** RIAC is committed to operating its ACDBE program in a nondiscriminatory manner. RIAC's Policy Statement is elaborated on the first page of this program.

**ACDBE Liaison Officer (ACDBELO):** We have designated the following individual as our ACDBELO:

Mr. Shahzad Sadozai  
Assistant Chief Financial Officer  
Rhode Island Airport Corporation  
2000 Post Road  
Warwick, RI 02886  
[ssadozai@pvdairport.com](mailto:ssadozai@pvdairport.com)

In that capacity, the ACDBELO is responsible for implementing all aspects of the ACDBE program and ensuring that RIAC complies with all provision of 49 CFR Part 23. The ACDBELO has direct, independent access to RIAC's President and CEO concerning ACDBE program matters. An organization chart displaying the ACDBELO's position in the organization is found in Attachment 1 of this program.

The ACDBELO is responsible for developing, implementing and monitoring the ACDBE program, in coordination with other appropriate officials. The ACDBELO has a staff of one to assist in the administration of the program. The duties and responsibilities to ensure compliance with the ACDBE program include but are not limited to:

1. Gathers and reports statistical data and other information as required by FAA or DOT.
2. Reviews third party contracts and purchase requisitions for compliance with this program.
3. Works with all departments to set overall annual goals.
4. Ensures that bid notices and requests for proposals are available to ACDBEs in a timely manner.

5. Identifies contracts and procurements so that ACDBE goals are included in solicitations (both race-neutral methods and contract specific goals).
6. Analyzes RIAC's progress toward attainment and identifies ways to improve progress.
7. Participates in pre-bid meetings.
8. Advises the CEO/governing body on ACDBE matters and achievement.
9. Assists in the coordination of ACDBE firms with the State of Rhode Island Uniform Certification Program.
10. Participates in ACDBE training seminars.
11. Acts as liaison to the Uniform Certification Process in Rhode Island.
12. Provides outreach to ACDBEs and community organizations to advise them of opportunities.

The duties and responsibilities of the ACDBELO and other officials include the following:

#### Financial Analyst and Administrator

- Assists the ACDBELO in accomplishing the duties and responsibilities listed above.
- Coordinates, process's and administers FAA Grants necessary to fund RIAC CIP.
- Coordinates activities necessary to prepare, execute, process, and track the performance of contracts related to the CIP.
- Administers invitations for bid, request for proposals, and other competitive solicitations.
- Maintains clear audit trail of all bid and vendor determinations.
- Examines purchase requisitions and combines and clarifies such requisitions as necessary.

**Directory:** The Rhode Island Department of Administration (RIDOA) Office of Diversity, Equity & Opportunity and Minority Business Enterprise Compliance Office maintains a directory identifying all firms eligible to participate as ACDBEs and updates the directory at least annually. The directory lists the firm's name, address, phone number, and the type of work the firm has been certified to perform as an ACDBE. An updated directory may be obtained at <http://odeo.ri.gov/offices/mbeco/dbe-program.php> or upon written request to the RIAC ACDBELO.

Mr. Shahzad Sadozai  
Assistant Chief Financial Officer  
Rhode Island Airport Corporation  
2000 Post Road  
Warwick, RI 02886  
[ssadozai@pvdairport.com](mailto:ssadozai@pvdairport.com)

### **Section 23.25 Ensuring Nondiscriminatory Participation of ACDBEs**

RIAC will take the following measures to ensure nondiscriminatory participation of ACDBEs in concession, and other covered activities (23.25(a))

RIAC will seek ACDBE participation in all types of concession activities, rather than concentrating participation in one category or a few categories to the exclusion of others. (23.25(c))

RIAC's overall goal methodology, a description of the race-neutral measures it will take to meet the goals are described in Section 23.25 and Attachments 3 and 4 of this plan. The goals are set consistent with the requirements of Subpart D (23.25(b), (d)).

If RIAC projects that race-neutral measures, standing alone, are not sufficient to meet an overall goal, it will use race-conscious measures as described in Section 23.25 and Attachments 3 and 4 of this plan (23.25(e)).

RIAC will require businesses subject to ACDBE goals at the airport (except car rental companies) to make good faith efforts to explore all available options to meet goals, to the maximum extent practicable, through direct ownership arrangements with ACDBEs. We will not use set-asides or quotas as a means of obtaining ACDBE participation. (23.25 (f)(g))

### **Section 23.27 Reporting**

RIAC will retain sufficient basic information about our ACDBE program implementation, ACDBE certification and the award and performance of agreements and contracts to enable the FAA to determine our compliance with Part 23. This data will be retained for a minimum of three (3) years following the end of the concession agreement or other covered contract.

We will submit to the FAA Regional Civil Rights Office, an annual ACDBE participation report using the form as required in Appendix A of Part 23.

### **Section 23.29 Compliance and Enforcement Procedures**

RIAC will take the following monitoring and enforcement mechanisms to ensure compliance with 49 CFR Part 23.

1. We will bring to the attention of the Department of Transportation any false, fraudulent, or dishonest conduct in connection with the program, so that DOT can take the steps (e.g., referral to the Department of Justice for criminal prosecution, referral to the DOT Inspector General, action under suspension and debarment or Program Fraud and Civil Penalties rules) provided in 26.107.
2. We will consider similar action under our own legal authorities, including responsibility determinations in future contracts.
3. We will also implement a monitoring and enforcement mechanism to ensure that work committed to ACDBEs at contract award is actually performed by the ACDBEs. This mechanism will provide for a running tally of actual ACDBE attainments (e.g., payment actually made to ACDBE firms), including a means of comparing these attainments to commitments. This will be accomplished by periodically auditing and monitoring the development staff.
4. In our reports of ACDBE participation to FAA, we will show both commitments and attainments, as required by the DOT reporting form.

## **SUBPART C – CERTIFICATION AND ELIGIBILITY**

**Section 23.31** We will use the procedures and standards of Part 26, except as provided in 23.31, for certification of ACDBEs to participate in our concessions program and such standards are incorporated herein.

RIAC will use the Rhode Island Department of Administration (RIDOA) Office of Diversity, Equity & Opportunity (ODEO) and Minority Business Enterprise Compliance Office (MBECO) of the State of Rhode Island for RIAC's ACDBE Certification Process. Firms wishing to be certified as an ACDBE-Owned Business must comply with CFR 26.61-26.91 as published in the Federal Register on February 2, 1999, as amended. Those firms seeking to be qualified as a Rhode Island Certified ACDBE-Owned Business should contact the following department of the RIDOA:

Department of Administration  
Office of Diversity, Equity & Opportunity  
Minority Business Enterprise Compliance Office  
One Capitol Hill  
Providence, Rhode Island 02908  
Website: <http://odeo.ri.gov/>

RIAC utilizes the Rhode Island Statewide Certification Program.

RIAC has entered into a Memorandum of Understanding (MOU) with the Rhode Island Department of Transportation, Rhode Island Public Transit Authority and RIDOA for the establishment of a Unified Certification Program (UCP). Under this MOU, RIDOA agrees to perform all ACDBE certification activities in accordance with the criteria and procedures of 49 CFR Part 26, Subparts D and E and to otherwise comply with all provisions of Subparts D and E, unless specifically exempt.

RIAC will use RIDOA's ODEO MBECO to confirm the eligibility of ACDBEs that are certified under Part 26 to make sure that they meet the standards of Subpart D. As needed, RIAC will confirm with RIDOA to ensure that ACDBE certificates are current.

RIAC will presume that a firm that is certified as an ACDBE under Part 26 is eligible to participate as an ACDBE. However, before determining such eligibility, we will ensure that the disadvantaged owners of an ACDBE certified under part 26 are able to control the firm with respect to its activity in our concessions program. We are not obligated to deem a firm that is ACDBE eligible under Part 26 as an ACDBE if the firm does not do work relevant to our concessions program (23.37).

We recognize that the provisions of part 26, sections 26.83(c) (2-6) do not apply to certifications for purposes of Part 23. We will obtain resumes or work histories of the principal owners of the firm and personally interview these individuals. We will determine the work history of the firm, including any concession contracts or other contracts it may have received. We will compile a list of the licenses of the firm and its key personnel to perform the concession contracts or other contracts it wishes to receive. We will obtain a statement from the firm of the types of concessions it prefers to operate or the type of other contracts it prefers to perform. We will ensure that the ACDBE firm meets the applicable size standard (23.39(a)(b)).



We acknowledge that a prime contractor includes a firm holding a prime contract with an airport concessionaire to provide goods or services to the concessionaire or a firm holding a prime concession agreement with a recipient. We recognize that the eligibility of Alaska Native Corporations (ANC) owned firms for purposes of part 23 is governed by part 26 section 26.73(h) (23.39(c)(d)).

We will use the certification standards of Part 23 to determine the ACDBE eligibility of firms that provide goods and services to concessionaires (23.39(i)).

In instances when the eligibility of a concessionaire is removed after the concessionaire has entered into a concession agreement because the firm exceeded the size standard or the owner has exceeded the PNW standard, and the firm in all other respects remains an eligible ACDBE, we may continue to count the concessionaire's participation toward ACDBE goals during the remainder of the current concession agreement. We will not count the concessionaire's participation toward ACDBE goals beyond the termination date for the concession agreement in effect at the time of the decertification (23.39(e)).

## **SUBPART D – GOALS, GOOD FAITH EFFORTS, AND COUNTING**

### **Section 23.41 Basic Overall Goal Requirement**

RIAC will establish two separate overall ACDBE goals; one for car rentals and another for concessions other than car rentals. The overall goals will cover a three (3) year period and the sponsor will review the goals annually to make sure the goal continues to fit the sponsor's circumstances. The sponsor will report any significant overall goal adjustments to the FAA.

If the annual car rental concession revenues averaged over the preceding three (3) years do not exceed \$200,000, we need not submit an overall goal for car rentals. If the annual concession revenues other than car rentals averaged over the preceding three (3) years do not exceed \$200,000, we need not submit an overall goal for non-car rentals. We understand that "revenue" means total revenue generated by concessions, not the fees received by the airport from concessions.

The sponsor's overall goals will provide for participation by all certified ACDBEs and will not be subdivided into group-specific goals.

### **Section 23.43 Consultation in Goal Setting**

RIAC will consult with stakeholders before submitting the overall goals to the FAA. Stakeholders will include, but not be limited to, minority and women's business groups, community organizations, trade associations representing concessionaires currently located at the airport, as well as existing concessionaires themselves, and other officials or organizations which could be expected to have information concerning the availability of disadvantaged businesses, the effects of discrimination on opportunities for ACDBEs, and the sponsors efforts to increase participation of ACDBEs.

In its submission of its overall goals, the sponsor will identify the stakeholders that it consulted with and provide a summary of the information obtained from the stakeholders.

### **Section 23.45 Overall Goals**

RIAC is a small hub primary airport. As a condition of eligibility for FAA financial assistance, the sponsor will submit its overall goals to FAA every three (3) years by October 1.

If a new concession opportunity arises at a time that falls between the normal submission dates above and the estimated average of annual gross revenues are anticipated to be \$200,000 or greater, the sponsor will submit an appropriate adjustment to our overall goal to FAA for approval at least ninety (90) days before issuing the solicitation for the new concession opportunity. (23.45i)

RIAC will establish overall goals in accordance with the two-step process as specified in section 23.51. After determining the total gross receipts for the concession activity, the first step is to determine the relative availability of ACDBEs in the market area, "base figure". The second step is examine all relevant evidence reasonably available in the sponsor's jurisdiction to determine if an adjustment to the Step 1 "base figure" is necessary so that the goal reflects as accurately as possible the ACDBE participation the sponsor would expect in the absence of discrimination. Evidence may include, but is not limited to past participation by ACDBEs, a disparity study,

evidence from related fields that affect ACDBE opportunities to form, grow, and compete (such as statistical disparities in ability to get required financing, bonding, insurance; or data on employment, self-employment, education, training and union apprenticeship).

The sponsor will arrange solicitations, times for the presentation of bids, quantities, specifications, and delivery schedules in ways that facilitate participation by ACDBEs and other small businesses and by making contracts more accessible to small businesses, by means such as those provided under § 26.39 of this part.

A description of the methodology to calculate the overall goal for concessions other than car rentals, the goal calculations, and the data we relied on can be found in Attachments 3 and 5 to this program.

A description of the methodology to calculate the overall goal for car rentals, the goal calculations, and the data we relied on can be found in Attachments 4 and 5 to this program.

### **Projection of Estimated Race-Neutral & Race-Conscious Participation (23.45(f),23.25(d-e))**

The breakout of estimated race-neutral and race-conscious participation can be found with the goal methodology in Attachment 5 to this program. This section of the program will be reviewed annually when the goal calculation is reviewed under 23.41(c).

### **Concession Specific Goals (23.25(c)(e)(1)(iv))**

RIAC will use concession specific goals to meet any portion of the overall goals RIAC does not project being able to meet using race-neutral means. Concession specific goals are established so that, over the period to which the overall goals apply, they will cumulatively result in meeting any portion of our overall goal that is not projected to be met through the use of race-neutral means.

RIAC will establish concession specific goals only on those concessions that have direct ownership arrangements (except car rentals), sublease, or subcontracting possibilities. We will require businesses subject to ACDBE goals at the airport (except car rental companies) to make good faith efforts to explore all available options to meet goals, to the maximum extent practicable, through direct ownership arrangements with DBEs (23.25 (f)). Car rental firms are not required to change their corporate structure to provide for direct ownership arrangements. In the case of a car rental goal, where it appears that all or most of the goal is likely to be met through the purchases by car rental companies of vehicles or other goods or services from ACDBEs, one permissible alternative is to structure the goal entirely in terms of purchases of goods and services.)

We need not establish a concession specific goal on every such concession, and the size of concession specific goals will be adapted to the circumstances of each such concession (e.g., type and location of concession, availability of ACDBEs).

If the objective of a concession specific goal is to obtain ACDBE participation through direct ownership with an ACDBE, RIAC will calculate the goal as a percentage of the total estimated annual gross receipts from the concession (23.25(e)(1)(i)).

If the concession specific goal applies to purchases and/or leases of goods and services, RIAC will calculate the goal by dividing the estimated dollar value of such purchases and/or leases from ACDBEs by the total estimated dollar value of all purchases to be made by the concessionaire (23.25(e)(1)(ii)) .

### **Good Faith Efforts Procedures on Concession Specific Goals (23.25(e)(1)(iii), (iv))**

To be eligible to be awarded a concession that has a concession specific goal; competitors must make good faith efforts to meet the goal. A competitor may do so either by obtaining enough ACDBE participation to meet the goal or by documenting that it made sufficient good faith efforts to do so. (23.25(e)(1)(iv)). Examples of good faith efforts are found in Appendix A to 49 CFR Part 26. The procedures applicable to 49 CFR Part 26.51 and 26.53, regarding contract goals apply to RIAC's concession specific goals.

### **Section 26.53 Good Faith Efforts Procedures**

#### Demonstration of good faith efforts (26.53(a) & (c))

The following personnel are responsible for determining whether a concessionaire who has not met the concession specific goal has documented sufficient good faith efforts to be regarded as responsive.

Mr. Shahzad Sadozai  
Assistant Chief Financial Officer  
Rhode Island Airport Corporation  
2000 Post Road  
Warwick, RI 02886-1533  
[ssadozai@pvdairport.com](mailto:ssadozai@pvdairport.com)

We will ensure that all information is complete and accurate and adequately documents the concessionaire's good faith efforts before we commit to the concession agreement with the bidder/offeror.

#### Information to be submitted (26.53(b))

RIAC treats concessionaire's compliance with good faith efforts' requirements as a matter of responsiveness.

Each solicitation for which a contract specific goal has been established will require the concessionaires to submit the following information:

- (1) Award of the contract will be conditioned on meeting the requirements of this section;
- (2) All bidders or offerors will be required to submit the following information to the recipient, at the time provided in paragraph (b)(3) of this section:
  - (i) The names and addresses of ACDBE firms that will participate in the contract;
  - (ii) A description of the work that each ACDBE will perform. To count toward meeting a goal, each ACDBE firm must be certified in a NAICS code applicable to the kind of work the firm would perform on the contract;
  - (iii) The dollar amount of the participation of each ACDBE firm participating;
  - (iv) Written documentation of the bidder/offeror's commitment to use an ACDBE sub-concession whose participation it submits to meet a contract goal; and

- (v) Written confirmation from each listed ACDBE firm that it is participating in the contract in the kind and amount of work provided in the prime concessionaire's commitment.
  - (vi) If the contract goal is not met, evidence of good faith efforts (see Appendix A of this part). The documentation of good faith efforts must include copies of each ACDBE and non-ACDBE sub-concession quote submitted to the bidder when a non-ACDBE sub-concession was selected over an ACDBE for work on the contract; and
- (3) We will require that the bidder/offeror present the information required by paragraph (b)(2) of this section under sealed bid procedures, as a matter of responsiveness, or with initial proposals, under contract negotiation procedures.

Administrative reconsideration (26.53)(d))

Within seven (7) days of being informed by RIAC that it is not responsive because it has not documented sufficient good faith efforts, a concessionaire may request administrative reconsideration. Concessionaire should make this request in writing to the following reconsideration official:

Airport Legal Counsel  
Rhode Island Airport Corporation  
2000 Post Road  
Warwick, RI 02886

An informational copy of this request should be sent to:

Mr. Iftikhar Ahmad  
President and CEO  
Rhode Island Airport Corporation  
2000 Post Road  
Warwick, RI 02886

The reconsideration official will not have played any role in the original determination that the concessionaire did not document sufficient good faith efforts.

As part of this reconsideration, the concessionaire will have the opportunity to provide written documentation or argument concerning the issue of whether it met the goal or made adequate good faith efforts to do so. The concessionaire will have the opportunity to meet in person with our reconsideration official to discuss the issue of whether it met the goal or made adequate good faith efforts to do so. We will send the concessionaire a written decision on reconsideration, explaining the basis for finding that the concessionaire did or did not meet the goal or make adequate good faith efforts to do so. The result of the reconsideration process is not administratively appealable to the Department of Transportation.

Good Faith Efforts when an ACDBE is replaced on a concession (26.53(f))

RIAC will require a concessionaire to make good faith efforts to replace an ACDBE that is terminated or has otherwise failed to complete its concession agreement, lease, or subcontract with another certified ACDBE, to the extent needed to meet the concession specific goal. We will require the concessionaire to notify the ACDBELO immediately of the ACDBEs inability or unwillingness to perform and provide reasonable documentation.

In this situation, we will require the concessionaire to obtain our prior approval of the substitute ACDBE and to provide copies of new or amended subcontracts, or documentation of good faith efforts.

We will provide such written consent only if we agree, for reasons stated in our concurrence document, that the prime concession has good cause to terminate the ACDBE firm. For purposes of this paragraph, good cause includes the following circumstances:

- (1) The listed ACDBE sub-concession fails or refuses to execute a written contract;
- (2) The listed ACDBE sub-concession fails or refuses to perform the work of its sub-concession in a way consistent with normal industry standards. Provided however, that good cause does not exist if the failure or refusal of the ACDBE sub-concession to perform its work on the sub-concession results from the bad faith or discriminatory action of the prime contractor;
- (3) The listed ACDBE sub-concession fails or refuses to meet the prime concession's reasonable, non-discriminatory bond requirements.
- (4) The listed ACDBE sub-concession becomes bankrupt, insolvent, or exhibits credit unworthiness;
- (5) The listed ACDBE sub-concession is ineligible to work on public works projects because of suspension and debarment proceedings pursuant to 2 CFR Parts 180, 215 and 1,200 or applicable state law;
- (6) We have determined that the listed ACDBE subcontractor is not responsible;
- (7) The listed ACDBE sub-concession voluntarily withdraws from the project and provides to us written notice of its withdrawal;
- (8) The listed ACDBE is ineligible to receive ACDBE credit for the type of work required;
- (9) An ACDBE owner dies or becomes disabled with the result that the listed ACDBE concession is unable to complete its work on the contract;
- (10) Other documented good cause that we have determined compels the termination of the ACDBE sub-concession. Provided, that good cause does not exist if the prime concession seeks to terminate an ACDBE it relied upon to obtain the contract so that the prime concession can self-perform the work for which the ACDBE concession was engaged or so that the prime contractor can substitute another ACDBE or non-ACDBE concession after contract award.

Before transmitting to RIAC its request to terminate and/or substitute an ACDBE sub-concession, the concessionaire must give notice in writing to the ACDBE sub-concession, with a copy to RIAC, of its intent to request to terminate and/or substitute, and the reason for the request.

The concessionaire must give the ACDBE five days to respond to the concessionaire's notice and advise RIAC and the concessionaire of the reasons, if any, why it objects to the proposed termination of its sub-concession and why we should not approve the concessionaire's action. If required in a particular case as a matter of public necessity (e.g., safety), we may provide a response period shorter than five days.

RIAC will require a concessionaire to make good faith efforts to replace an ACDBE that is terminated or has otherwise failed to complete its work on a concession with another certified ACDBE. These good faith efforts shall be directed at finding another ACDBE to perform at least the same amount of work under the concession contract as the ACDBE that was terminated, to the extent needed to meet the concession contract goal that we established for the

procurement. The good faith efforts shall be documented by the concessionaire. If we request documentation from the concessionaire under this provision, the concessionaire shall submit the documentation to us within 7 days, which may be extended for an additional 7 days if necessary at the request of the concessionaire, and the recipient shall provide a written determination to the concessionaire stating whether or not good faith efforts have been demonstrated.

We will include in each prime concession contract the contract clause required by § 26.13(b) stating that failure by the concessionaire to carry out the requirements of this part is a material breach of the contract and may result in the termination of the concession contract or such other remedies set forth in that section that we deem appropriate if the prime concessionaire fails to comply with the requirements of this section.

If the concessionaire fails or refuses to comply in the time specified, our contracting office will issue an order stopping all or part of payment/work until satisfactory action has been taken. If the concessionaire still fails to comply, the contracting officer may issue a termination for default proceeding.

#### Sample Proposal/Bid Specification:

The requirements of 49 CFR Part 23, regulations of the U.S. Department of Transportation, applies to this concession. It is the policy of RIAC to practice nondiscrimination based on race, color, sex, or national origin in the award or performance of this contract. All firms qualifying under this solicitation are encouraged to submit bids/proposals. Award of this concession will be conditioned upon satisfying the requirements of this proposal/bid specification. These requirements apply to all concessions firms and suppliers, including those who qualify as an ACDBE. An ACDBE concession specific goal of \_\_\_% percent of (annual gross receipts; value of leases and/or purchases of goods and services) has been established for this concession. The concession firm shall make good faith efforts, as defined in Appendix A, 49 CFR Part 26 (Attachment 2), to meet the concession specific goal for ACDBE participation in the performance of this concession.

The concession firm will be required to submit the following information: (1) the names and addresses of ACDBE firms and suppliers that will participate in the concession, (2) A description of the work that each ACDBE will perform; (3) The dollar amount of the participation of each ACDBE firm participating; (4) Written and signed documentation of commitment to use a ACDBE whose participation it submits to meet a contract goal; (5) Written and signed confirmation from the ACDBE that it is participating in the concession as provided in the prime concessionaire's commitment; and (6) If the contract goal is not met, evidence of good faith efforts.

#### **Section 23.53 Counting ACDBE Participation for Car Rental Goals**

We will count ACDBE participation toward overall goals other than car rental as provided in 49 CFR 23.53.

#### **Section 23.55 Counting ACDBE Participation for Concessions Other than Car Rentals**

We will count ACDBE participation toward overall goals other than car rental as provided in 49 CFR 23.55

### **Section 23.57(b) Goal Shortfall Accountability**

If the awards and commitments on our Uniform Report of ACDBE Participation (found in Appendix A to this Part) at the end of any fiscal year are less than the overall goal applicable to that fiscal year, we will:

1. Analyze in detail the reasons for the difference between the overall goal and our awards and commitments in that fiscal year;
2. Establish specific steps and milestones to correct the problems we have identified in our analysis to enable us to fully meet our goal for the new fiscal year;
3. Submit, within 90 days of the end of the fiscal year, the analysis and corrective actions developed under paragraphs (b)(1) and (2) of this section to the FAA for approval.

### **Section 23.61 Quotas or Set-Asides**

We will not use quotas or set-asides as a means of obtaining ACDBE participation.



## **SUBPART E – OTHER PROVISIONS**

### **Section 23.71 Existing Agreements**

RIAC will assess potential for ACDBE participation when an extension or option to renew an existing agreement is exercised, or when a material amendment is made. We will use any means authorized by Part 23 to obtain a modified amount of ACDBE participation in the renewed or amended agreement.

### **Section 23.75 Long-Term Exclusive Agreements**

RIAC will not enter into a long-term and exclusive agreements for concessions without prior approval of the FAA Regional Civil Rights Office. RIAC understands that a “long-term” agreement is one having a term of longer than five (5) years, and that an “exclusive” agreement is one in which an entire category of a particular business opportunity is limited to a single business entity. If special, local circumstances exist that make it important to enter into a long-term and exclusive agreement, RIAC will submit detailed information to the FAA Regional Civil Rights Office for review and approval.

### **Section 23.79 Geographic Preferences**

We will not use a: “local geographic preference”, i.e., any requirement that gives an ACDBE located in one place (e.g., the local area) an advantage over ACDBEs from other places in obtaining business as, or with, a concession at Rhode Island T. F. Green International Airport.

## **ATTACHMENTS**

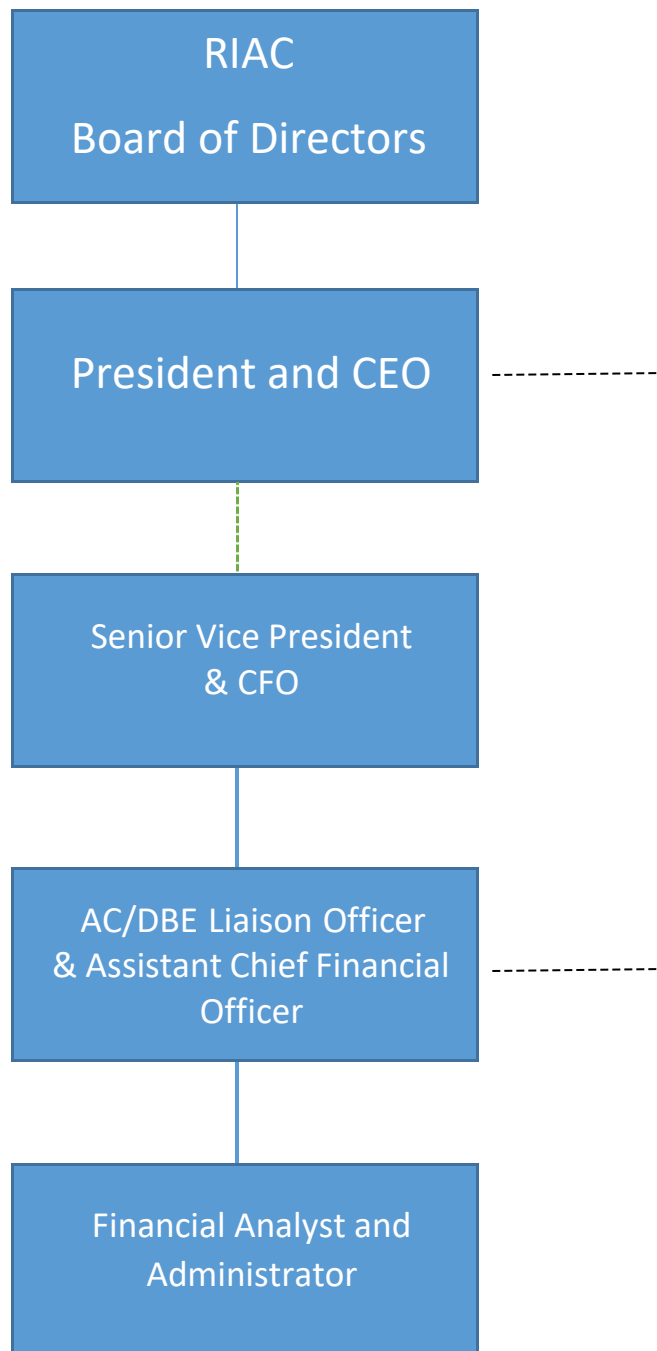
Attachment 1	Organizational Chart
Attachment 2	Monitoring and Enforcement Mechanisms and Demonstration of Good Faith Efforts
Attachment 3	Goal for Concessions other than Car Rental Calculation, Consultation, Breakout of Estimated Race-Neutral & Race- Conscious Participation
Attachment 4	Goal for Car Rentals Calculation, Consultation, Breakout of Estimated Race-Neutral & Race- Conscious Participation
Attachment 5	Proposed ACDBE Overall Concession Goals
Attachment 6	Certification Application Forms and Procedures for Removal of ACDBE's Eligibility
Attachment 7	Regulations: 49 CFR Part 23



**Rhode Island Airport Corporation**

## **ATTACHMENT 1**

### **Organizational Chart**





**Rhode Island Airport Corporation**

## **ATTACHMENT 2**

### **Monitoring and Enforcement Mechanisms and Demonstration of Good Faith Efforts**

## **Monitoring and Enforcement Mechanisms**

RIAC has available several remedies to enforce the ACDBE requirements contained in its contracts, including, but not limited to, breach of contract action, pursuant to the terms of the contract.

In addition, the federal government has available several enforcement mechanisms that it may apply to firms participating in the ACDBE program, including, but not limited to, the following:

1. Suspension or debarment proceedings pursuant to 49 CFR part 23;
2. Enforcement action pursuant to 49 CFR part 31; and
3. Prosecution pursuant to 18 USC 1001.

RIAC will implement various mechanisms to monitor program participants to ensure they comply with Part 23 and demonstrate good faith efforts, including, but not limited to the following:

1. Concessionaire shall submit an ACDBE Plan, which shall be attached to this Agreement as Exhibit \_\_ upon approval by the Airport. Concessionaire agrees that within ten (10) days following the end of each month of the Term, it will provide a report to the Rhode Island Airport Corporation in a form acceptable to RIAC, describing the gross receipts of each ACDBE described on attached Exhibit “\_\_” (and each substitute ACDBE obtained pursuant to paragraph (3) below), or in the case of a rental car concession, the dollar value of vehicles and other goods and services purchased by the Concessionaire from each such ACDBE, for each month of the Term. Concessionaire shall also submit within sixty (60) days of the end of each year of the Term of this Agreement, an annual statement requirements of 49 CFR Part 23.
2. Concessionaire agrees that it will also submit within the same periods described in (1) above a report to RIAC, in a form acceptable to RIAC, describing the Concessionaire's total gross receipts for each month of the term and each year of the term as provided in paragraph 1 above or in the case of a rental car concession, the total dollar value of vehicles and other goods and services purchased by the Concessionaire for each year of the Term of this Agreement.
3. Concessionaire will have no right to terminate an ACDBE for convenience without RIAC's prior written consent. If an ACDBE is terminated by the Concessionaire with RIAC's approval or because of the ACDBE's default, then the Concessionaire must make a good faith effort, in accordance with the requirements of 49 CFR section 23.25 (e)(1)(iii) and (iv), and 49 CFR section 26.53, to find another ACDBE to substitute for the original ACDBE to perform the same estimated gross receipts (or in the case of a rental car concession, to sell the same amount of vehicles and other goods and services) under the contract as the ACDBE that was terminated.
4. The Concessionaires breach of its obligations under (1), (2) or (3) above shall be a default by Concessionaire under Section \_\_ (the default provisions of this Agreement) and shall entitle RIAC to exercise all of its contractual and legal remedies, including termination of this Agreement.

### **Demonstration of Good Faith Efforts**

The following forms will be provided as part of the solicitation documents:

Exhibit 1 Letter of Intent

Exhibit 2 Airport Concession Disadvantaged Business Enterprise (ACDBE) Waiver Form

Exhibit 3 Airport Concession Disadvantaged Business Enterprise (ACDBE) Utilization Plan

**EXHIBIT 1**

**LETTER OF INTENT TO PERFORM  
AS A QUALIFIED AIRPORT CONCESSIONS DISADVANTAGED BUSINESS**

To: \_\_\_\_\_  
(Name of Concessionaire)

Project: \_\_\_\_\_

Contract #: \_\_\_\_\_

The undersigned intends to perform work in connection with the above project as (check one):

\_\_\_\_\_ an individual

\_\_\_\_\_ a corporation

\_\_\_\_\_ a partnership

\_\_\_\_\_ a joint venture

The undersigned certifies the company is a Disadvantaged Business Enterprise as defined by the Rhode Island Department of Administration.

The undersigned is prepared to perform the following described work in connection with the above project (specify in detail work to be performed).

Subconcessionaire: \_\_\_\_\_  
(Name)

Contract Amount \_\_\_\_\_

Supplier: \_\_\_\_\_  
(Name)

Contract Amount \_\_\_\_\_

The Bid Price agreed upon is: \$ \_\_\_\_\_ Dated \_\_\_\_\_

The undersigned agrees that the contract conditions above are true and accurate and will be performed by the above, who will enter into a formal agreement for the above work with you, conditioned upon your execution of a contract with

\_\_\_\_\_  
Name of company, signature and title of authorized official of the company and the date must be properly executed on this document or the bid will be deemed nonresponsive.

\_\_\_\_\_  
(Date)

\_\_\_\_\_  
(Name of Disadvantaged Company)

\*As determined by \_\_\_\_\_

\_\_\_\_\_  
(Signature of Authorized Official)

\_\_\_\_\_  
(Title of Authorized Official)

## **EXHIBIT 2**

### **ACDBE WAIVER FORM**

(Required for All Bids Requesting Waiver of the \_\_\_\_% ACDBE Requirement)

I, \_\_\_\_\_, \_\_\_\_\_, of \_\_\_\_\_  
(Name) (Title) (Company)

certify that on \_\_\_\_\_, I contacted the following ACDBE Firm to obtain a bid for work  
(date)  
items to be performed on Contract # \_\_\_\_\_.

ACDBE Firm Name and Address

Work Items Sought

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

To the best of my knowledge and belief, said ACDBE Firm was unavailable (exclusive of unavailability due to lack of agreement on price) for work on this project, or unable to prepare a bid for the following reason(s):

Signature \_\_\_\_\_ Date \_\_\_\_\_

This portion to be completed by ACDBE Contractor:

\_\_\_\_\_ was offered an opportunity to bid or make an offer on the  
(Name of ACDBE)

above identified work on \_\_\_\_\_ by \_\_\_\_\_.  
(Date) (Source)

The above statement is a true and accurate account of why I did not submit an offer/bid on this project.

\_\_\_\_\_  
(Signature of ACDBE)

\_\_\_\_\_  
(Title)



### **EXHIBIT 3**

#### **AIRPORT CONCESSIONS DISADVANTAGED BUSINESS ENTERPRISE UTILIZATION PLAN**

The undersigned hereby further assures that the information included herein is true and correct, and that the A CDBE firm(s) listed herein have agreed to perform a commercially useful function in the work items noted for each firm. The undersigned further understands that no changes to this statement may be made without prior approval from the Civil Rights Staff of the Federal Aviation Administration.

1. Name of Project\_\_\_\_\_

2. Contract #\_\_\_\_\_

3. Total Dollar Amount of Bid\_\_\_\_\_

4. Disadvantaged Business Enterprise Participation \$ Goal \_\_\_\_\_

a. Name of Bidder\_\_\_\_\_

Address\_\_\_\_\_

Phone(s)\_\_\_\_\_

b. If the Bidder is an Airport Concessions Disadvantaged Business Enterprise (Subconcession, Contractors, suppliers, vendors), the services they will provide and the approximate amount of money they will receive. (Include joint venture partner, if applicable.)

Total of listed amounts \$\_\_\_\_\_

(Use back of sheet for additional space, if needed)

Contractor: \_\_\_\_\_

By: \_\_\_\_\_

Address:\_\_\_\_\_

Phone Number:\_\_\_\_\_ Zip Code:\_\_\_\_\_



**Rhode Island Airport Corporation**

## **ATTACHMENT 3**

### **Goal Calculation for Concessions Other Than Car Rentals**

## **Overall Goal Calculation for Concessions Other Than Car Rentals**

Name of Recipient: **Rhode Island Airport Corp. (RIAC)**

Name of Airport(s): **Rhode Island T. F. Green International**

Goal Period: **FY 2022-24 (10/1/2021 through 9/30/2024)**

Three-Year Goals: **FFY 2022 = 33.31%, FFY 2023 = 2.55%, FFY 2024 = 2.55%**

### **Market Area**

Rhode Island Airport Corp. (RIAC) has determined that the market area for Rhode Island T. F. Green International is the State of Rhode Island. Additionally, a nationwide market area has been identified for food and beverage, and retail/news and gifts. 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 in which the firms which receive the substantial majority of concessions-related revenues are located.

The concession opportunities anticipated during this goal period for this market area are: ATM, food and beverage, passenger lounge, news and gifts, retail, and goods and services.

### **Base of the goal**

To calculate the base of the goal, Rhode Island Airport Corp. (RIAC) considered the most recent previous 3 years of gross concession receipts for current operators shown in Table 1 in Attachment 5, and the projected potential concession revenue (gross receipts) three years into the future including upcoming new opportunities.

**Table 3-1**

<b>Year</b>	<b>Non-Car Rental Concessions Gross Receipts</b>
2019	\$22,460,410
2020	\$10,409,138
2021	\$8,089,004 <sup>1</sup>

<sup>1</sup> Gross receipts for concessionaires that ceased operations were removed from the 2021 amount as a basis for estimated growth calculation in the next page.

Rhode Island Airport Corp. (RIAC) estimates that revenues to existing concessions will grow by an average of 28% each year over the next three years due to growth projection based on expected passenger enplanements forecast.

**Table 3-2**

Year	Annual Growth / Reduction Estimate	Annual Gross Receipts Estimate
2022	23%	\$9,949,475
2023	31%	\$13,033,812
2024	29%	\$16,813,617
Three-Year Total Gross Receipts:		\$39,796,904
Average Annual Growth Rate:		28%

$\$9,949,475 + \$13,033,812 + \$16,813,617 = \mathbf{\$39,796,904}$  which is the recipient's base of goal for non-car rental concessions.

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, Rhode Island Airport Corp. (RIAC) 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.

#### **Methodology used to Calculate Overall Goal**

Rhode Island Airport Corp. (RIAC) can meet the percentage goal by including any business operated through a management contract or subcontract with an ACDBE. Rhode Island Airport Corp. (RIAC), 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 recipient'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.

Rhode Island Airport Corp. (RIAC), and the businesses at the airport, 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.

Rhode Island Airport Corp. (RIAC) will include goods and services purchases from ACDBEs toward meeting the goal.

## Background

In October 2019, RIAC awarded two (2) master concessionaire contracts for food and beverage, and for retail concessionaire concepts. Shortly after, the full impact of the Covid-19 pandemic started to impact the airline industry, airports, and concessionaires. Several existing concessionaires ceased operations at Rhode Island T. F. Green International and by June 2020, the gross revenue for food and beverage, and retail concessions declined as much as 98% over the prior year, and the entire industry was negatively impacted. As such, concessionaires reassessed their current and future agreements, and requested RIAC work with them to address the significant downturn in enplanements and the uncertain timing and extent of the recovery for the industry. In recognition of this changed environment and based on the impacts of the Covid-19 situation, RIAC was successful in negotiating a retail concessionaire agreement, however, the food and beverage concessionaire informed RIAC that regardless of RIAC's efforts to develop amended terms reflective of the current situation, they are unable to enter into a new agreement. Upon learning that an agreement would not be reached, RIAC entered into a one year agreement with mutual one-year option to extend with Carry on Coffee dba Dunkin'. In addition, RIAC also solicited for a limited portion of the food and beverage concepts and entered into a one year agreement with one-year mutual option to extend with Grove Bay Concessions, a certified ACDBE prime concessionaire in the state of Rhode Island (RI). These efforts made it possible for RIAC to continue to offer passengers food and beverage services in a limited capacity during this time. Both of these food and beverage contracts expire in FFY 2023 and a new opportunity will be available during this ACDBE Plan period.

### **Step 1 - Actual Relative Availability of ACDBEs - \$23.51 (c)**

We determined the base figure for the relative availability of ACDBEs other than car rentals. The base figure was calculated 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

The data source(s) used in the calculation included:

Source:

- (1) United State Census Bureau, using Table CB1700CBP County Business Patterns by Legal Form of Organization and Employment Size Class for U.S., States, and Selected Geographies: 2017  
<https://data.census.gov/cedsci/>
- (2) State of Rhode Island, Office of Diversity, Equity & Opportunity, Minority Business Enterprise  
<http://odeo.ri.gov/offices/mbeco/dbe-program.php>

The calculation and explanation for this is as follows:

**Table 3-3**

NAICS Code	Industry Description	RI Establishments (1)	RI Certified ACDBE Firms (2)	% Availability
448310	Jewelry Stores	81	0	0.00%
451212	News Dealers and Newsstands	3	1	33.33%
453220	Gift, Novelty and Souvenir Stores	102	3	2.94%
454210	Vending Machine Operators	11	0	0.00%
522320	Financial Transactions Processing, Reserve, and Clearinghouse	22	0	0.00%
722310	Food Service Contractors	162	2	1.23%
722515	Snack and Non-Alcoholic Beverage Bars	425	0	0.00%
812990	Other Personal Services	41	0	0.00%
<b>TOTAL</b>		<b>847</b>	<b>6</b>	<b>0.71%</b>

Total ACDBE Firms Available for Concessions	6	=	0.71%
Total Relevant RI Establishments	847		

ACDBE concession goals for federal fiscal years 2022 - 2024 have been set based on current concession contracts and available ACDBE firms to service such concessions based on relevant industry types and the associated ACDBE firms registered in the State of Rhode Island. When we calculated the percentage availability we arrived at the Step 1 base figure for our overall goal for non-car rental concessions of **0.71%**.

### **Step 2 - Adjustment**

After calculating the base figure of the relative availability of ACDBE's as noted at 0.71% above, RIAC has evaluated the current capacity of ACDBE's to perform work in the concessions program by measuring the volume of work ACDBE's have performed in the past year with new ACDBE's in the market area, as well as new concessionaire contracts to determine if an adjustment to the base goal is necessary.

RIAC's concessionaire program over the past two (2) years has changed as a result of the Covid-19 impact to the industry. RIAC determined an adjustment to the goal was necessary, and incorporated future concession growth using the projected enplanement percentages from the Table 3-2. Table 3-4 reflects the estimated gross receipts applied to the concessionaires currently operating at Rhode Island T. F. Green International Airport. RIAC applied the current contract commitments with ACDBEs, if any, or estimated ACDBE revenue using the Step One Base figure to estimate ACDBE goals for each of the next three years.

RIAC realizes the volatility of Covid-19 and its impact on our concessionaire program, therefore RIAC calculated a goal for each FFY, rather than one overall goal, that will more accurately reflect RIAC's ACDBE Program overall. The estimated ACDBE Goals for each FFY are shown in Table 3-4 and explained further in this attachment. RIAC considers the goals and accomplishments calculated in FFY2021 and FFY2022 to be an anomaly, and not representative of RIAC's historical performance, as illustrated below:

### Historical Accomplishments

FFY	Goal	Actual	Over (Under)
2021*	0.20%	33.20%	33.00%
2020	0.20%	0.19%	-0.01%
2019	0.20%	0.26%	0.06%
2018	0.20%	0.27%	0.07%
2017	1.00%	0.34%	-0.66%
2016	1.00%	0.31%	-0.69%
2015	1.00%	0.16%	-0.84%

\*ACDBE Prime Concessionaire

Please note, RIAC will be soliciting a new contract for food and beverage in 2022 with estimated gross receipts of \$20,485,993 and may impact the estimated concession revenue analysis during the goal period. RIAC recognizes new and/or terminating contracts will materially affect this analysis, and will amend this plan accordingly, once such conditions are made known.

RIAC has continued to work with the Office of Diversity, Equity & Opportunity (ODEO) and the Minority Business Enterprise Compliance Office (MBECO) of the State of Rhode Island for RIAC's ACDBE/DBE Certification Process to increase the available pool of AC/DBE's within the market area. Over the past three years, RIAC and the MBECO have evaluated the potential AC/DBE's in surrounding areas and have performed outreach measures to interstate certify AC/DBE's that were not already ready, willing and available for work and certified in the market area. Outreach efforts have increased available ACDBE's in the market area by 153%, from 17 ACBDE's in 2018 to 43 ACDBE's in 2021.

Currently, RIAC has an operating agreement with Grove Bay Concessions, a certified ACDBE operating as the prime concessionaire, providing limited food and beverage concessions until FFY 2023. In accordance with 49 CFR § 23.55, RIAC included all FFY 2022 estimated gross receipts for the ACDBE prime concessionaire in its goal calculation. Subsequently, RIAC will be soliciting a new contract for food and beverage in FFY 2022, and the estimated gross receipts are shown separately in Table 3-4 under Food & Beverage (New). Since this will be a new contract RIAC applied the Step One goal of 0.71% to include toward an estimated ACDBE goal projection.

In addition, RIAC currently has an operating agreement with Paradies Lagardère @ PVD, LLC to provide retail merchandise services through 2032. This agreement includes Pleasant News, Inc. a RI certified ACDBE, operating as a member of the company with a 5% interest, contributing a commercially useful function to include, but not limited to the following

responsibilities: directing, overseeing and approving all facets of the company's snacks merchandising operations including purchasing, ordering, inventory management, reporting, tracking, monitoring, store merchandising, signage, display and visual standards, on/off airport community relationships, and participating in trade associations.

**Table 3-4**

**ESTIMATED GROSS RECEIPTS - OTHER THAN CAR RENTAL**

**FFY 2022 - FFY 2024**

Concessionaire	Type	Gross Receipts Estimate FFY2022	ACDBE Estimated Gross Receipts FFY 2022	Gross Receipts Estimate FFY 2023	ACDBE Estimated Gross Receipts FFY 2023	Gross Receipts Estimate FFY 2024	ACDBE Estimated Gross Receipts FFY 2024	Estimated 3-Year Gross Receipts	ACDBE Estimated 3-Year Gross Receipts
Carry On Coffee dba Dunkin'	Food & Beverage	\$ 2,038,837		\$ 2,670,877		\$ 3,445,431		\$ 8,155,144	
Citizens Bank	ATM	\$ 9,056		\$ 11,863		\$ 15,304		\$ 36,223	
Grove Bay Concessions <sup>1</sup>	Food & Beverage	\$ 3,082,789	\$ 3,082,789	\$ -	\$ -	\$ -	\$ -	\$ 3,082,789	\$ 3,082,789
Food & Beverage (New) <sup>2</sup>	Food & Beverage	\$ -	\$ -	\$ 4,038,454	\$ 28,673	\$ 5,209,606	\$ 36,988	\$ 9,248,059	\$ 65,661
MAG US Lounge Management LLC	Passenger Lounge	\$ 71,415		\$ 93,553		\$ 120,683		\$ 285,651	
Paradies Lagardère @ PVD, LLC <sup>3</sup>	Gift/News	\$ 4,630,640	\$ 231,532	\$ 6,066,139	\$ 303,307	\$ 7,825,319	\$ 391,266	\$ 18,522,097	\$ 926,105
Ready Credit Corporation	Currency Transfer	\$ 6,845		\$ 8,967		\$ 11,567		\$ 27,379	
Smarte Carte	Luggage Cart Rental	\$ 109,893		\$ 143,960		\$ 185,708		\$ 439,561	
<b>TOTAL OTHER THAN CAR RENTAL</b>		<b>\$ 9,949,475</b>	<b>\$ 3,314,321</b>	<b>\$ 13,033,812</b>	<b>\$ 331,980</b>	<b>\$ 16,813,617</b>	<b>\$ 428,254</b>	<b>\$ 39,796,904</b>	<b>\$ 4,074,555</b>
<b>Estimated ACDBE Goal by FFY</b>		<b>33.31%</b>		<b>2.55%</b>		<b>2.55%</b>			

<sup>1</sup> ACDBE Prime Concessionaire, agreement expires November 2022

<sup>2</sup> **New** Food & Beverage Concessionaire commencing December 2022

<sup>3</sup> ACDBE is a partner with 5% interest, agreement expires April 2032

The ACDBE annual goals are calculated below:

*FFY 2022 ACDBE Goal calculated as follows:*

$$\frac{\text{FFY 2022 ACDBE Estimated Gross Receipts}}{\text{Gross Receipts Estimate FFY2022}} = \frac{\$ 3,314,321}{\$ 9,949,475} = \underline{\underline{33.31\%}}$$

*FFY 2023 ACDBE Goal calculated as follows:*

$$\frac{\text{FFY 2023 ACDBE Estimated Gross Receipts}}{\text{Gross Receipts Estimate FFY2023}} = \frac{\$ 331,980}{\$ 13,033,812} = \underline{\underline{2.55\%}}$$

*FFY 2024 ACDBE Goal calculated as follows:*

$$\frac{\text{FFY 2024 ACDBE Estimated Gross Receipts}}{\text{Gross Receipts Estimate FFY2024}} = \frac{\$ 428,254}{\$ 16,813,617} = \underline{\underline{2.55\%}}$$



Based on these calculations, and considering the current base goal of 0.71%, RIAC has chosen to adjust the other than car rental ACDBE goal upwards to the following:

FFY 2022 = 33.31%  
FFY 2023 = 2.55%  
FFY 2024 = 2.55%

**Breakout of Estimated “Race and Gender Neutral” (RN) and “Race and Gender Conscious” (RC) Participation**

Rhode Island Airport Corp. (RIAC) will make every reasonable effort to meet the maximum feasible portion of its overall goal by using race-neutral means of facilitating ACDBE participation. Rhode Island Airport Corp. (RIAC) will use 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.

- Locate and identify ACDBEs and other small businesses who may be interested in participating as concessionaires under 49 CFR Part 23
- Notify ACDBEs of concession opportunities and encouraging them to compete, when appropriate
- When practical, structure concession activities so as to encourage and facilitate the participation of ACDBEs
- Ensure that competitors for concession opportunities are informed during pre-solicitation meetings about how the sponsor's ACDBE program will affect the procurement process
- Provide information concerning the availability of ACDBE firms to competitors to assist them in obtaining ACDBE participation
- Establish a business development program (see 49 CFR Part 26.35); technical assistance program or taking other steps to foster ACDBE participation in concessions

If race-neutral measures, standing alone, are not sufficient to meet an overall goal, the following race-conscious measures will be used to meet the overall goal:

- Establish concession-specific ACDBE goals for particular concession opportunities.
- Negotiate with potential concessionaires to include ACDBE participation through direct ownership arrangements or measures, in the operation of the concession.

Rhode Island Airport Corp. (RIAC) estimates that, in meeting each FFY goal, it will obtain the following breakout race-neutral participation and race-conscious measures:

RN	30.98%	RN	0.00%	RN	0.00%
RC	2.33%	RC	2.55%	RC	2.55%
<b>FFY 2022</b>	<b>33.31%</b>	<b>FFY 2023</b>	<b>2.55%</b>	<b>FFY 2024</b>	<b>2.55%</b>

The reason for the breakout in FFY 2022 is that ACDBE prime concessionaire is expected to accomplish at least 30.98% of the participation, therefore we are applying 2.33% toward race neutral participation and 2.33% toward race conscious participation. For FFY's 2023 & 2024,

although RIAC has on average accomplished their goals in recent years, it has only been by a slight margin less than 0.1%. Therefore, RIAC has applied 0% race-neutral and the remaining 2.55% is applied to race-conscious participation.

Extent of your race-neutral business assistance efforts.

- Information obtained and outreach efforts through consultation with stakeholders.
- ACDBE participation on other city or county concession activity.

In order to ensure that Rhode Island Airport Corp. (RIAC)'s ACDBE program will be narrowly tailored to overcome the effects of discrimination, if concession specific goals are used, Airport will adjust the estimated breakout of race-neutral and race-conscious participation as needed to reflect actual ACDBE participation and race-neutral and race conscious participation will be tracked 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.

Rhode Island Airport Corp. (RIAC) will maintain data separately on ACDBE achievements in those contracts with and without concession specific goals, respectively.

### **Consultation**

Rhode Island Airport Corp. (RIAC) routinely meets with stakeholders in an effort to increase ACDBE participation. Stakeholders consulted included minority and women's business groups, community organizations, trade associations representing concessionaires currently located at the airport, as well as existing concessionaires themselves, and other officials or organizations which could be expected to have information concerning the availability of disadvantaged businesses, the effects of discrimination on opportunities for ACDBEs, and the sponsor's efforts to increase participation of ACDBEs.

Specifically, RIAC may facilitate a stakeholders meeting for each concession opportunity during the goal setting process for the specified opportunity, when applicable. We will invite the current concessionaires, ACDBEs listed in the State of Rhode Island DBE Directory for the appropriate trades, and members of the various organizations listed in Attachment 5 of the ACDBE Program. A summary of the information provided by the stakeholders will be documented for each contract opportunity.

The following comments were received during the course of the consultation: None



**Rhode Island Airport Corporation**

## **ATTACHMENT 4**

### **Goal Calculation for Car Rentals**

## Overall Goal Calculation for Car Rental Concessions FY 2022-24

Name of Recipient: **Rhode Island Airport Corp. (RIAC)**

Name of Airport(s): **Rhode Island T. F. Green International**

Goal Period: **FY 2022-24 (10/1/2021 through 9/30/2024)**

Overall Three-Year Goal: **0.0%, to be accomplished through 0.0% Race Conscious and 0.0% Race Neutral**

### **Goal Based on Gross Receipts - Determination**

We have the following car rental agencies operating at the airport: Enterprise, Alamo, Hertz, Thrifty, Avis-Budget, Dollar, National, and Payless.

There are no concession opportunities anticipated during this goal period. The current car rental contracts do not expire until October 2030, which is after the goal period. RIAC intends to pursue the collection of information relating to purchasing of goods and services and ACDBE availability for rental car opportunities during this period in order to be prepared to set goals for these concessions at their expiration.

### **Market Area**

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 in which the firms which receive the substantial majority of concessions-related revenues are located.

Rhode Island Airport Corp. (RIAC) has determined that its market area for Rhode Island T. F. Green International Airport is the State of Rhode Island.

### **Base of the goal**

To calculate the base of the goal, Rhode Island Airport Corp. (RIAC) considered the most recent previous 3 years of gross concession receipts and the projected potential concession revenue (gross receipts) three years into the future including upcoming new opportunities.

<b>Year</b>	<b>Car Rental Concessions Gross Receipts</b>
2019	\$49,629,179
2020	\$27,484,519
2021	\$37,666,603

Rhode Island Airport Corp. (RIAC) estimates that revenues to existing concessions will grow by an average of 28% each year over the next three years due to growth projection based on expected passenger enplanement forecast.

Year	Annual Growth / Reduction Estimate	Annual Gross Receipts Estimate
2022	23%	\$46,329,922
2023	31%	\$60,692,197
2024	29%	\$78,292,935
Three-Year Total Gross Receipts:		\$185,315,054
Average Annual Growth Rate:		28%

$\$46,329,922 + \$60,692,197 + \$78,292,935 = \$185,315,054$  which is the recipient's base of goal for car rental concessions.

The following are not included in this base: (a) non-car rental operations.

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 Rhode Island Airport Corp. (RIAC) 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))

### **Step 1 - Actual Relative Availability of ACDBEs - §23.51 (c)**

We determined the base figure for the relative availability of ACDBEs for car rental goods and services purchases. The base figure was calculated 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

The data source(s) used in the calculation included:

- State UCP Data showing the number of ACDBEs that are certified within the market area (<https://odeo.ri.gov/offices/mbeco/dbe-program.php>)
- Census Bureau Data (<https://data.census.gov/cedsci/>)

The calculation and explanation for this is as follows:

Concession Activity	NAICS	# ACDBE Certified Firms	# Total Firms	% Availability
Car Rental	532111	0	52	0.0%
Average ACDBE Availability:				0.0%

When we calculated the average availability we arrived at the Step 1 base figure for our overall goal for car rental concessions of **0.0%**.

FY	Race Conscious (%)	Race Neutral (%)	Total Achievement (%)
FY 21	0.0%	0.0%	0.0%
FY 20	0.0%	0.0%	0.0%
FY 19	0.0%	0.0%	0.0%
FY 18	0.0%	0.0%	0.0%
FY 17	0.0%	0.0%	0.0%

#### **Breakout of Estimated “Race and Gender Neutral” (RN) and “Race and Gender Conscious” (RC) Participation**

Rhode Island Airport Corp. (RIAC) will make every reasonable effort to meet the maximum feasible portion of its overall goal by using race-neutral means of facilitating ACDBE participation. The airport will use 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.

- Locate and identify ACDBEs and other small businesses who may be interested in participating as concessionaires under 49 CFR Part 23
- Notify ACDBEs of concession opportunities and encouraging them to compete, when appropriate
- When practical, structure concession activities so as to encourage and facilitate the participation of ACDBEs
- Ensure that competitors for concession opportunities are informed during pre-solicitation meetings about how the sponsor's ACDBE program will affect the procurement process
- Provide information concerning the availability of ACDBE firms to competitors to assist them in obtaining ACDBE participation
- Establish a business development program (see 49 CFR Part 26.35); technical assistance program or taking other steps to foster ACDBE participation in concessions

If race-neutral measures, standing alone, are not sufficient to meet an overall goal, the following race-conscious measures will be used to meet the overall goal:

- Establish concession-specific ACDBE goals for particular concession opportunities.

- Negotiate with potential concessionaires to include ACDBE participation through direct ownership arrangements or measures, in the operation of the concession.

Rhode Island Airport Corp. (RIAC) estimates that, in meeting the overall goal of 0.0%, it will obtain 0.0% from race-neutral participation and 0.0% through race-conscious measures. The reason for the breakout is that Rhode Island Airport Corp. (RIAC) has not been able to achieve its goal in recent past years and will use ACDBE concession goals to achieve this goal.

There are no concession opportunities anticipated during this goal period. The current car rental contracts do not expire until October 2030, which is after the goal period. RIAC intends to pursue the collection of information relating to purchasing of goods and services and ACDBE availability for rental car opportunities during this period in order to be prepared to set goals for these concessions at their expiration.

In order to ensure that Rhode Island Airport Corp. (RIAC)'s ACDBE program will be narrowly tailored to overcome the effects of discrimination, if concession specific goals are used, Airport will adjust the estimated breakout of race-neutral and race-conscious participation as needed to reflect actual ACDBE participation and race-neutral and race conscious participation will be tracked 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.

Rhode Island Airport Corp. (RIAC) will maintain data separately on ACDBE achievements in those contracts with and without concession specific goals, respectively.

### **Consultation**

Rhode Island Airport Corp. (RIAC) routinely meets with stakeholders in an effort to increase ACDBE participation. Stakeholders consulted included minority and women's business groups, community organizations, trade associations representing concessionaires currently located at the airport, as well as existing concessionaires themselves, and other officials or organizations which could be expected to have information concerning the availability of disadvantaged businesses, the effects of discrimination on opportunities for ACDBEs, and the sponsor's efforts to increase participation of ACDBEs.

Specifically, Rhode Island Airport Corp. (RIAC) may facilitate a stakeholders meeting for each concession opportunity during the goal setting process for the specified opportunity, when applicable. We will invite the current concessionaires, ACDBEs listed in the State of Rhode Island DBE Directory for the appropriate trades, and members of the various organizations listed in Attachment 5 of the ACDBE Program. A summary of the information provided by the stakeholders will be documented for each contract opportunity.

The following comments were received during the course of the consultation: None



**Rhode Island Airport Corporation**

## **ATTACHMENT 5**

### **Overall Concession Goal**



**Proposed ACDBE Overall Concession Goals**

**2022 – 2024**

**Airport Sponsor: Rhode Island Airport Corporation  
Rhode Island T. F. Green International Airport (PVD)  
Warwick, Rhode Island**

**Goal Period:**

FY 2022	From: October 1, 2021 To: September 30, 2022
FY 2023	From: October 1, 2022 To: September 30, 2023
FY 2024	From: October 1, 2023 To: September 30, 2024

ACDBE Goal for Car Rental Concession:	FY 2022: 0.0%
	FY 2023: 0.0%
	FY 2024: 0.0%

ACDBE Goal for Terminal Concession:	FY 2022: 33.31%
	FY 2023: 2.55%
	FY 2024: 2.55%

**TABLE 5-1**

**RHODE ISLAND AIRPORT CORPORATION  
CONCESSION ACTIVITIES  
FOR THE PERIOD OF:  
October 1, 2018 to September 30, 2021**

						ACDBE Gross
Name of Firm	Type of Business	FFY19 Gross Revenue	FFY20 Gross Revenue	FFY21 Gross Revenue	FFY19-FFY20 Total Revenue	Revenue 3-Year Period
Advantage Rent A Car	Car Rental	\$ -	\$ -	\$ -	\$ -	\$ -
Alamo Rent A Car	Car Rental	5,003,675	2,181,293	2,871,806	\$ 10,056,774	-
Avis Rent A Car	Car Rental	6,443,151	3,288,573	4,864,999	\$ 14,596,723	-
Budget Rent A Car	Car Rental	6,563,612	3,590,260	6,956,388	\$ 17,110,261	-
Dollar Rent A Car	Car Rental	3,130,725	2,023,630	4,969,760	\$ 10,124,115	-
Enterprise Rent A Car	Car Rental	7,233,891	4,259,700	6,548,804	\$ 18,042,394	-
Hertz Corporation	Car Rental	10,035,427	5,725,072	6,824,387	\$ 22,584,886	-
National Car Rental	Car Rental	6,599,943	3,552,139	3,983,883	\$ 14,135,965	-
Payless Car Rental	Car Rental	451,811	271,971	646,574	\$ 1,370,357	-
Thrifty Car Rental	√ Car Rental	4,166,946	2,591,881	-	\$ 6,758,827	-
TOTAL CAR RENTAL		\$ 49,629,179	\$ 27,484,519	\$ 37,666,603	\$ 114,780,301	\$ -
Atlas ATM	√ ATM	\$ 12,620	\$ 3,339	\$ -	\$ 15,959	\$ -
Bank of America	√ ATM	14,850	7,953	3,930	\$ 26,733	-
Candy Hangar	√ Food & Beverage	161,416	64,430	-	\$ 225,846	-
Carry On Coffee dba Dunkin'	Food & Beverage	0	256,634	1,657,591	\$ 1,914,226	-
Citizens Bank	ATM	22,712	12,522	7,363	\$ 42,597	-
Concourse Communications	√ Wi-fi	135,572	95,928	-	\$ 231,500	-
Gineva Murano Glass Jew elry	√w Retail	226,758	102,343	-	\$ 329,101	-
Grove Bay Concessions	Food & Beverage	-	-	2,506,333	\$ 2,506,333	2,506,333
Healing Hands	√ Massage Services	28,901	6,777	-	\$ 35,678	-
Host International	√ Food & Beverage	13,911,864	5,928,241	-	\$ 19,840,105	-
International Shoppes	√ Duty Free	264,021	-	-	\$ 264,021	-
MAG US Lounge Management LLC	Passenger Lounge	340,031	392,615	58,061	\$ 790,707	-
Paradies Shops	Gift/New s	6,731,600	3,315,642	3,764,748	\$ 13,811,990	285,768
PVD Shines	√ Shoeshine Stand	0	32,771	-	\$ 32,771	-
Ready Credit Corporation	Currency Transfer	12,655	6,380	5,565	\$ 24,600	-
Shades	√ Retail	155,451	-	-	\$ 155,451	-
Smarte Carte	Luggage Cart Rental	155,137	79,356	89,344	\$ 323,836	-
Travelex	√ Currency Exchange	-	-	-	\$ -	-
Zoom Systems	√w Retail	286,822	104,207	-	\$ 391,028	-
TOTAL OTHER THAN CAR RENTAL		\$ 22,460,410	\$ 10,409,138	\$ 8,092,934	\$ 40,962,482	\$ 2,792,100
TOTAL CONCESSION REVENUES		\$ 72,089,590	\$ 37,893,657	\$ 45,759,536	\$ 155,742,783	\$ 2,792,100

√ ceased operations

√w operating as subconcession under Paradies



**Rhode Island Airport Corporation**

## **ATTACHMENT 6**

# **Certification Application Forms and Procedures for Removal of ACDBE's Eligibility**

### **Certification Application Forms and Procedures for Removal of ACDBE's Eligibility**

RIAC has entered into a Memorandum of Understanding (MOU) with the Rhode Island Department of Transportation (RIDOT), Rhode Island Public Transit Authority (RIPTA) and the RIDOA for the establishment of a Unified Certification Program (UCP). Under this MOU, the RIDOA agrees to perform all ACDBE/DBE certification activities in accordance with the criteria and procedures of Part 23 and 26, Subparts D and E and to otherwise comply with all provisions of Subparts D and E, unless specifically exempt.

RIAC will use the Office of Diversity, Equity & Opportunity and the Minority Business Enterprise Compliance Office of the State of Rhode Island for RIAC's ACDBE/DBE Certification Process. Firms wishing to be certified as an ACDBE/DBE-Owned Business must comply with CFR 26.61-26.91 as published in the Federal Register on February 2, 1999, as amended. Those firms seeking to be qualified as a Rhode Island Certified ACDBE/DBE-Owned Business should contact the following department of the State of Rhode Island:

Department of Administration  
Office of Diversity, Equity & Opportunity  
Minority Business Enterprise Compliance Office  
One Capitol Hill  
Providence, Rhode Island 02908-5890  
Website: <http://odeo.ri.gov/offices/mbeco/>

Since the Rhode Island Airport Corporation is not a certifying agency, it does not have responsibility for removal of ACDBE eligibility. The Office of Diversity, Equity & Opportunity and the Minority Business Enterprise Compliance Office of the State of Rhode Island handles any such removal.



**Rhode Island Airport Corporation**

## **ATTACHMENT 7**

**Regulations: 49 CFR Part 23**

**<http://www.ecfr.gov>**

**Regulations: 49 CFR Part 23**

The Regulations 49 CFR Part 23 can be obtained at <http://www.ecfr.gov>



**Rhode Island Airport Corporation**

## **ATTACHMENT 8**

**ACDBE Directory**

**<http://odeo.ri.gov/offices/mbeco/dbe-program.php>**

Company Name	First	Last	Address	City	State	Zip	Email Address	Telephone	Minority Status	DBE Cert	Primary NAICS	Products
Longhouse Inventory Solutions, LLC	Jami	Jones	P.O. Box 1212	Claremore	OK	74018	jami@lisstore.com	(918) 342-3127	I/W	ACDBE	423990	distributor of child safety seats; supplier of car seat storage bags, vinyl tags, security loops, dapple cleaner, and locking clips; distributor of specialty sign bases and trolley frames; distributor of security key drops; distributor of miscellaneous accessories; manufacturer of key drop boxes
Eat Up, Incorporated, d/b/a Eat Up	Duane	Marshall	19242 E. Baker Place	Aurora	CO	80013	duane.marshall@eatupco.com	(303) 246-5719	B	ACDBE	425120	provider of mobile ordering platform for airport restaurants and businesses
Saxon Ventures, LLC	Nadia	Asanchev	6 University Road	Cambridge	MA	02138	nasanchev@saxonventuresllc.com	(202) 253-9776	W	ACDBE	451212	book store; news dealer and newstand; gift, novelty and souvenir store
Grove Bay Concessions, LLC	Francesco	Balli	2640 S. Bayshore Drive, Suite 302	Miami	FL	33133	francesco@grovebaygroup.com	(786) 866-9854	H	ACDBE	722310	food service contractors, full-service restaurants, fast casual restaurants, snack and non-alcoholic beverage bars
Bangel Groups, Inc., d/b/a Sbarro's	Monir	Saji	4 Shea Circle	Burlington	MA	01803	bangelinc@aol.com	(781) 389-7634	A	ACDBE	722513	limited service restaurant
Diversity Food Brands, LLC	Jeffery	Keys	53 Stonebridge Road	Montclair	NJ	07042	jkeys@diversityfoodbrands.com	(917) 690-6463	B	ACDBE	722513	management and consulting and administrative services, including airport concession management services
Bulkfest, Inc., d/b/a LoAdebar	Norma	Maloney	7866 Stepping Stone Lane	Ooltewah	TN	37363	info@loadebar.com	(877) 306-2988	B/W	DBE/ACDBE	311340	manufacturer of natural, gluten free, organic, vegan and non-GMO energy bars; food service contractor; food health supplement stores; other grocery and related products merchant wholesaler; non-chocolate confectionary manufacturing
Kim & Gary's Ice Cream Machine, Inc.	Kim	Caron	4288 Diamond Hill Road	Cumberland	RI	02864	kimcaron59@gmail.com	(401) 333-5053	W	DBE/ACDBE	311520	wholesale and retail sales and manufacturing / production of ice cream and ice cream pies
JCM & Associates, Inc., d/b/a Blue Goose Uniforms	Jose	Cornejo	5443 E. Washington Boulevard	Commerce	CA	90040	tonycornejo@bluegooseuniforms.com	(800) 543-3732	H	DBE/ACDBE	315999	apparel, accessories and other apparel manufacturing supplier; other clothing store
US Eco Products Corporation	Doreen	Blades	143 Essex Street, Suite 210	Haverhill	MA	01832	doreen@usecoproducts.com	(978) 457-9229	W	DBE/ACDBE	424690	supplier and distributor of alternative green, environmentally sustainable products; safety products to replace road salt, magnesium chloride, potassium chloride; solvents found on the USDA's bio-preferred catalog and part of ISO 14001; absorbents; bio-remedial cleaners and degreasers; pesticides and nursery supplies
Atlantic Petroleum & Mineral Resources, Inc.	Anthony	Ndah	1445 North Loop West #242	Houston	TX	77008	andah@atlanticpetro.com	(713) 223-2767	B	DBE/ACDBE	425120	reseller of diesel fuel and petroleum lubricants and chemicals
Secured Mobility, LLC	Michael	Laranang	1 Lower Ragsdale Drive, Suite #156	Monterey	CA	93940	mike@securedmobility.com	(877) 619-3136	A	DBE/ACDBE	425120	wholesale trade agent and broker
DF Express, LLC, d/b/a La Boutique	Sonia	Acevedo	5775 Blue Lagoon Drive, Suite 310	Miami	FL	33126	sonia@dfexpressllc.com	(786) 718-4540	H/W	DBE/ACDBE	446120	cosmetics, beauty supplies and perfume stores
Pleasant News, Inc.	Robert	Nix	1201 E. Hector Street, Suite 300	Conshohocken	PA	19428	pleasantnews@aol.com	(267) 784-4082	B	DBE/ACDBE	451212	retail newstand; book, newspaper, gift, novelty, and apparel merchant; food, retail and management services
Kellee Communications Group, Inc.	James	Kelly	220 26th Street, #8405	Atlanta	GA	30309	kelleeatl@gmail.com	(404) 767-0003	B	DBE/ACDBE	453220	gift, novelty and souvenir store; book store; news dealers and newstands; other telecommunications; full-service restaurants; limited-service eating places; other personal services
Love From USA Group, Inc.	Patricia	Chinander	2340 W. County Road C, Suite 180	Roseville	MN	55113	pchinander@lovefromusagroup.com	(651) 283-3666	W	DBE/ACDBE	453220	gift, novelty and souvenir store; candy store, packaged, retail; convenience food store; other specialty food store; baked goods store; clothing accessories store; other chemical and allied products merchant wholesaler; hand sanitizer
The Forrest Group, LLC	Allen	Forrest	1422 N. Curson Avenue, Suite 9	Los Angeles	CA	90046	ceo@tfglia.com	(619) 808-9798	B	DBE/ACDBE	453220	gift, novelty and souvenir store; advertising agency; media representative; outdoor advertising; direct mail advertising; advertising material distribution services; other services related to advertising; marketing research and public opinion polling; marketing consulting services; motion picture and video production; all other travel arrangements and reservation services; all other personal services
My City Transportation, Inc.	James	Crosby	17421 S. Miles Road	Cleveland	OH	44128	james@mycitytransportation.com	(216) 591-1900	B	DBE/ACDBE	485113	transportation operations contractor, including call center operations, maintenance and fueling operations, airport operations and tram services; motor vehicle supplies and new parts merchant wholesaler; bus and other motor vehicle transit systems, including bus services, urban and suburban; special needs transportation, including handicapped passenger transportation services, paratransit transportation services; and senior citizens transportation services; other transit and ground passenger transportation, including shuttle services; facilities support services; temporary help services; car washes and automobile detailing services; and automobile parking garages or lots
IMEX Cargo, LLC	Michelle	DeFronzo	480 William F. McClellan Highway, Suite 203C	East Boston	MA	02128	michelle@imexcargo.com	(617) 718-4639	W	DBE/ACDBE	488510	general sales agent; freight forwarding; 3rd party logistics; providing logistics and supply chain solutions; freight transportation arrangement; preparing goods for transportation (i.e. crating, packing); other support activities for transportation
Visage Productions, Inc.	Annette	Colbert-Latham	6303 Waterford Boulevard, Suite 235	Nichols Hills	OK	73118	adcolbert@yahoo.com	(405) 607-8722	W	DBE/ACDBE	512110	film and television production; advertising agency
Leslie Saunders Insurance Agency, Inc.	Quincy	Branch	4584 North Rancho Drive	Las Vegas	NV	89130	qbranch@lesliesaunders.com	(702) 646-2082	B	DBE/ACDBE	524210	insurance benefits, employee benefit broker, pet insurance, plan audits, and Cobra compliance
Keleusmatic Technologies, Inc.	Michael	Yu	8362 Pines Boulevard, Suite 131	Pembroke Pines	FL	33024	partners@keleusmatic.com	(954) 543-5701	A	DBE/ACDBE	541512	computer system design services; other management consulting services
Critical Skills, Inc., d/b/a Cspring	Cynthia	Pizarro	150 West Market Street, Suite 700	Indianapolis	IN	46204	cpizarro@cspring.com	(317) 848-9571	W	DBE/ACDBE	541519	IT consulting services including project management services and technical staffing needs
Chandler & Campbell Investment Group, LLC	Darrell	Searcy	310 Vizcaya Drive	Palm Beach Gardens	FL	33418	darrell@chandlercampbell.com	(404) 643-9747	B	DBE/ACDBE	541611	management consulting; training; project management; advertising; IT services and staffing; merchant wholesaler



Company Name	First	Last	Address	City	State	Zip	Email Address	Telephone	Minority Status	DBE Cert	Primary NAICS	Products
Global Gateway Concessions North America, LLC	Dane	Grey	76 S. Laura Street, Suite 1702	Jacksonville	FL	32202	dbe@eliteparkingsoa.com	(904) 297-4437	B	DBE/ACDBE	541611	administrative management and general management services; management consulting services
Lens Consulting Firm, LLC	Michelle	Weathersby	2108 Star Sapphire Drive	Raleigh	NC	27610	info@lensconsultingfirm.com	(919) 601-9033	W	DBE/ACDBE	541611	administrative management and general management consulting services; human resources consulting services; other management consulting services; professional and management development training; educational support services; and vocational rehabilitation services
Premiere Consulting Group	Alvin	Turner	503 Potomac Valley Drive	Fort Washington	MD	20744	aturner@premiereconsultinggroup.biz	(443) 650-8724	B	DBE/ACDBE	541611	administrative management and general management consulting services; specifically consulting for public and private parking and fare collection systems
R. R. Ramsey Research, LLC	Rebecca	Ramsey	2701 Glenoake Drive	Nashville	TN	37214	rebecca.ramsey1963@gmail.com	(615) 414-6977	W	DBE/ACDBE	541611	administrative management and general management consulting services; customer service management consulting services
Winston Strategic Partners, LLC	Diane	Winston	262 West Cedar Street	Norwalk	CT	06854	dwinston@winstonstrategicpartners.com	(203) 838-9789	W	DBE/ACDBE	541611	marketing; communications; change management; foreign language translation and interpretation; strategic insight; executive writing; speech writing and speech preparation; resume writing; public relations; graphic design and presentation skills; media buying
Magnitude Marketing, LLC	Mor	Bucknik	11072 Pinnacle Way	Parkland	FL	33076	mor@magmarketingusa.com	(954) 241-4362	W	DBE/ACDBE	541613	marketing consulting services; advertising; advertising material distribution services; marketing research and public opinion polling
Paseo, LLC	Love	Nance	1000 Liberty Park Drive, Apt 101	Austin	TX	78746	l@paseobrands.com	(512) 633-0057	W	DBE/ACDBE	541613	food consulting and brand development services to concessions program clients; brand name licensing; new product development consulting services; food concession contractors; food service contractors
Common Sense Environmental, Inc.	Cynthia	Gilchrest	38 Elm Street	New Bedford	MA	02740	cynthia@commonsenseenv.com	(508) 858-5606	W	DBE/ACDBE	541620	environmental consulting services; licensed asbestos inspector; asbestos sampling; environmental compliance; subsurface and site investigations; environmental due diligence audits (EDDAS); hazardous waste; drinking water sampling; industrial and tier II compliance; spill prevention countermeasures and control (SPCC); storage tank (UST/AST) removal oversight; bill of lading preparation; disposal profiling; remedial action recommendations; employee training; field and office administrative support services
Angel Flight Marketing Services, Inc.	Gabriel	Mitchell	1006 South Michigan Avenue, Suite 606	Chicago	IL	60605	gmitchell@angelfly.com	(312) 933-1878	B	DBE/ACDBE	541910	graphic design services, marketing, and direct mail services including direct mail lists, creation, and print production coordination
Tyler Communications, Inc.	Tony	Tyler	780 Morosgo Drive, Suite 14366	Atlanta	GA	30324	tony.tyler@tylercommunications.net	(401) 747-6800	B	DBE/ACDBE	561110	office administrative support services, computer training, professional and management development training, apprenticeship training, exam preparation and tutoring, educational support services, and janitorial supplies
Florida Cleaning Systems, Inc., d/b/a FCS Facility Services, Inc.	Ivette	Barrios	624 Douglas Avenue	Alamonte Springs	FL	32714	certs@fcsfacilityservices.com	(407) 586-7047	H/W	DBE/ACDBE	561720	janitorial services
Premier Cleaning Company, LLC	Felipe	Torres	6 Sacramento Street	Providence	RI	02909		(401) 413-3522	H	DBE/ACDBE	561720	janitorial services, including window cleaning, carpet cleaning, floor waxing, tile cleaning, and power washing services
Universal Cleaning Concept, LLC	Evanisio	Oliveira	77 Burgess Ave	East Providence	RI	02914	universalcc14@gmail.com	(401) 952-2844	B	DBE/ACDBE	561720	janitorial services
City Fresh Foods, Inc.	Glynn	Lloyd	P.O. Box 255698	Dorchester	MA	02119	glloyd@cityfresh.com	(617) 606-7123	B	DBE/ACDBE	722310	food service contractors; food and beverage management services and contractual food services; catering; vending; cafeteria services; meal delivery for federal, state and municipal buildings, healthcare, senior dining, state colleges, community colleges, city colleges, adult and child daycare, public and charter school lunch program, and childcare programs
H & H Hospitality, Inc.	Randolph	Hazelton	1110 Parker Place NE	Atlanta	GA	30324	kholt@hh-hospitality.com	(732) 266-2784	B	DBE/ACDBE	722511	full-service restaurants; drinking places (alcoholic beverages)
Chase Catering & Concessions, LLC	Edgar	Chase	4748 St. Roch Ave	New Orleans	LA	70122	edgarchase@chgnola.com	(504) 458-2689	B	DBE/ACDBE	723320	caterers; food service contractors; other management consulting services
Walsh's Auto Body & Sales, Inc.	Kim	Walsh	60 Narragansett Ave	Providence	RI	02907	kim@walshab.necoxmail.com	(401) 785-3560	W	DBE/ACDBE	811111	used car sales and auto body repair services
SGRI, Inc., d/b/a SuperGlass Windshield Repair	Errol	Graham	47 Wisdom Avenue, 3rd Floor	Providence	RI	02908	rhodeisland@superglass.com	(401) 473-7320	B	DBE/ACDBE	811122	glass restoration, including automobile windshield repair, classic car glass repair, scratch removal, headlamp restoration, chip repair, headlights, and acid rain removal for cars, trucks, boats and buildings
J Brown Detailing, LLC	Jairan	Brown	1215 Plainfield Street	Johnston	RI	02919	jairanbrown@gmail.com	(401) 465-7815	H	DBE/ACDBE	811192	auto detailing, mobile car wash services, pressure washing of automobiles and buildings, boat detailing, airplane detailing, and mobile detailing services