



August 1, 2008

James Brame  
U.S. Department of Transportation  
Federal Aviation Administration  
1701 Columbia Avenue  
College Park, GA 30337

**Re: Boca Raton Airport Authority**

Dear Mr. Brame:

Dickey Consulting Services, Inc. is the DBE Liaison Officer for the Boca Raton Airport Authority (BRAA). As required by 49 CFR Part 26, this letter serves as our notification of the Authority's goal and methodology for FY 2008/2009.

**Amount of Goal**

The Authority's overall DBE goal is 9.2% as a percentage of all FAA funds that will be expended in FAA assisted contracts in the forthcoming fiscal year. Given the amount of proposed FAA assisted contracts (\$2,567,500.00) that the Authority expects to award during this fiscal year, the goal is to expend approximately \$236,210.00 with DBE's during FY 2008/2009.

**Methodology**

Step 1: Determination of the Base Figure

The FY 2008/2009 projects: (Sound Insulation-Construction, Design/Construction Airport Service Road, and Design Pavement Rehabilitation) were used to identify the NAICS codes for the base figure. The table below shows the NAICS codes and types of industry for the projects:

**Table 1 – NAICS Codes for FY 2009 Projects**

NAICS	TYPE	DBE FIRMS	TOTAL FIRM
238210	Electrical Contractors & Other Wiring Installation Contractors	86	1451
238220	Plumbing , Heating, and Air Conditioning Contractors	58	1619
238310	Dry Wall Acoustical & Insulation Contractors	19	452
238320	House Painting & Repairing	45	855
237310	Asphalt Pavement	61	138
484220	Truck Hauling	14	231
541330	Construction Engineering Services	204	1125
541820	Public Relations	46	162
	Total:	533	6033

The base figure was based on the assumption that the firms identified in the above table are ready, willing, and able to do business on FAA assisted projects. The numerator was calculated using information about the total number of DBE firms and local program SBE firms doing business in the Authority's normal market area directories (Palm Beach, Broward and Miami Dade Counties). The denominator was calculated using 2004 Census Bureau County Business Patterns data. The boundaries of the local market area were determined based on the area in which the substantial majority of the contractors and subcontractors with which the BRAA does business are located, and the area in which the BRAA spends the substantial majority of their contracting dollars.

$$\text{Base Figure} = \frac{533}{6033} = 8.8\%$$

Step 2: Examination of Available Evidence to Determine Adjustment, if any, to the Base Figure

The Authority adjusted the Step One Base figure with the calculated median past participation percentage.

**Table 2 – Past DBE Participation**

Fiscal Year	DBE Goal	Actual DBE Participation	Over/Under Goal
2007/2008	9.3%	8%	-1.3%
2006/2007	12.8%	3%	-9.8%
2005/2006	15.4%	11.2%	-4.2%
2004/2005	15.4%	17.4%	+2%

- a. Determining the Median Past Participation – The step in adjusting the Step 1 Base Figure for past participation is to determine the median past participation percentages. The following was considered in calculating the median past participation percentage:

The median was determined by arranging the values of previous actual DBE participation from low to high: 3%, 8%, 11.2%, and 17.4%. The median is derived averaging the middle two values (8% + 11.2% = 19.2% / 2 = 9.6%) Therefore, 9.6% is the median past participation percentage.

- b. As a final step, we adjusted the Step 1 Base Figure with the Median Past Participation Percentage. Step 1 Base Figure adjusted for past participation was obtained by taking the average of the Step 1 Base Figure and the median past participation percentage. The average is obtained by adding together the Step 1 Base Figure 8.8% and the median past participation percentage of 9.6% and dividing by 2. The result is as follows:

$$\text{Overall Goal} = \frac{8.8\% + 9.6\%}{2} = \frac{18.4\%}{2} = 9.2\%$$

Therefore, 9.2% is the step one base figure adjusted for past participation. The Palm Beach County School Board conducted a Disparity Study in 2004 which is in our market area; however, because four years have passed we will not use the data to make adjustments to the base figure.

The Authority's under and over goals for the past four years have been -9.8%, -4.2%, -1.3% and +2%.

## **Breakout of Race/Neutral Means and Contract Goal Participation**

The Authority has received a total of \$2.6 million in FAA funds for FY 2008/2009 capital improvement projects. The Authority estimates it will obtain 4.5% of the total proposed goal of 9.2 % through race-neutral means and 4.7% through contract goal measures. These percentages are being recommended based on last year's percentage of participation that was through race-neutral means and that which was through contract goals.

Of the actual 8% DBE participation in fiscal year 2008, 4.5% was obtained through race-neutral means and 3.5% was obtained through contract measures. Since last year's goal was not met by 1.3%, it is our recommendation that the contract goal be 4.7% and that we meet the remaining goal through the race-neutral means by 4.5%, given this percentage was obtained last year under similar contracts.

The Authority will use the following race-neutral means to increase DBE participation: develop and disseminate a brochure describing the contract opportunities at the Airport; participate in tri-county small/disadvantaged business and minority business workshops; and post all Authority contract opportunities on the Airport's website.

In order to ensure that the DBE program will be narrowly tailored to overcome the effects of discrimination, if the Authority uses contract goals, it will adjust the estimated breakout of race-neutral means as needed to reflect actual DBE participation (see 26.51(f)).

For reporting purposes, race-neutral means includes, but is not necessarily limited to: DBE participation through a prime contract a DBE obtains through customary competitive procurement procedures; DBE participation through a subcontract on a prime contract that does not carry a DBE goal; DBE participation on a prime contract exceeding a contract goal; and DBE participation through a subcontract from a prime contractor that did not consider a firm's DBE status in making the award. Race-conscious participation will be achieved through the assignment of a DBE goal on contracts.

The Authority will maintain data separately on DBE achievements in those contracts with and without contract goals, respectively.

## **The Situation Analysis**

Over the past several years we have included Miami-Dade, Broward and Palm Beach County in the Authority's normal market area. At that time, all three counties had the same classification for their Minority and Women Owned Businesses. The current scenario in Miami-Dade County is their program classifications are Community Business Enterprise (CBE), Community Small Business Enterprise (CSBE), Micro Business Enterprise (MICRO), Small Business Enterprise (SBE), and/or Disadvantaged Business Enterprise (DBE). The first four are unique to their program. Broward County's local Minority/Women Business Enterprises (M/WBE) program has been suspended pending the outcome of a newly commissioned Disparity Study (June 2008); therefore, their classifications are Small Business Enterprise (SBE), Community Disadvantage Business Enterprise (CDBE) and Disadvantage Business Enterprise (DBE). Palm Beach County still has the former classifications of SBE'S, MBE'S and/or WBE'S as well as DBE'S. Therefore, we determined it was best to extract the ready, willing and able firms from the SBE directories in all three counties and the DBE'S (not listed otherwise) in all three counties for purposes of creating a methodology.

While conducting research for the tri-county business patterns it was noted that there was a decrease in firms in certain industries and is reflected in the decrease in DBE firms listed to conduct business in the tri-county area as well as through the FDOT Biz Net Directory.

### **The Strategy**

For fiscal year 2008-2009, DCS will continue the outreach efforts of the BRAA to insure more firms are aware of the program. We will do this by some of the following means outlined in the process below.

### **The Process**

The Authority is required to submit its overall DBE goal to FAA on August 1 of each year. The Authority will publish the FY 2008/2009 goal starting the week of July 21, 2008 on its website, [www.bocairport.com](http://www.bocairport.com) and in the tri-county area local newspapers (*Sun-Sentinel*, *El Heraldo*, *Caribbean Gleaner*, *Westside Gazette*) informing the public that the proposed goal and rationale are available for inspection during normal business hours at the Authority's office for 30 days following the date of the notice, and that the Authority will accept comments on the goals for 45 days from the date of the notice.

There will be continuous outreach with the Chambers of Commerce; The Greater Caribbean Chamber of Commerce, The Latin Chamber of Commerce, The Greater Miami Dade Chamber of Commerce, The Black Chamber of Commerce of West Palm Beach and other groups. The Authority will begin using its overall goal on October 1, 2008 of this year unless we have received other instructions from USDOT/FAA.