

FY 2025-2027 Airport Concession DBE Goal Methodology  
(Non-Car Rental Concessions)  
for



With Assistance From



October 2024

**METHODOLOGY** for Establishing the FY 2025 – FY 2027 Airport Concession Disadvantaged Business Enterprise (ACDBE) Goal for:

**St. Pete-Clearwater International Airport, Clearwater, FL (49 CFR Part 23)**

*In fulfillment of the requirements of 49 CFR Part 23, The St. Petersburg-Clearwater International Airport has developed a proposed Overall Goal for FY 2025 – FY 2027 for Concessions other than Car Rentals.*

**General Information:**

Airport Sponsor: **Pinellas County**

Airport: **St. Petersburg-Clearwater International Airport**

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**I. Amount of Goal**

The Airport's overall goal for concessions other than car rentals (i.e. non-car rental) during the period beginning October 1, 2024 and ending September 30, 2027 is the following:

Overall Goal:	<b><u>24.21%</u></b>
Race-Neutral:	<b><u>10.53%</u></b>
Race-Conscious:	<b><u>13.68%</u></b>

The goal is based on the total gross receipts for concessions at the Airport. The following are not included in the total gross receipts for concessions: (a) the gross receipts of car rental operations, (b) the dollar amount of a management contract or subcontract with a non-ACDBE such as the Airport's Parking Concession Agreement, (c) the gross receipts of business activities to which a management contract or subcontract with a non-ACDBE pertains, and (d) any portion of a firm's estimated gross receipts that will not be generated from a concession.

The concession revenues anticipated during this goal period for all non-car rental concessions is **\$5,723,636**. 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 Airport will submit an appropriate adjustment to the overall goal. This will be submitted to the FAA for approval no later than 90 days before issuing the solicitation for the new concession opportunity (23.45(i)).

**Table 1: Concession Lease Dates**

Concession	Concession Type	Contract Start Date	Contract End Date	Options
Departure Media	Advertising	2/17/2022	2/16/2027	2/16/2032
SSP	Food & Beverage	6/1/2019	5/31/2029	5/31/2034
Hudson	Gift, Novelty & Souvenir	6/1/2019	5/31/2029	5/31/2034
ATM Central	Banking	2/28/2025	2/28/2026	N/A
Smarte Carte	Baggage Cart Rental	2/28/2025	2/28/2026	N/A

**Projected Concessions Opportunities: October 1, 2024 – September 30, 2027**

Concessions revenue opportunity for the 3-year period is based upon the gross receipts for FY 2023. The total gross receipts for **FY 2023** for “all other” (non-car rental) concessions was **\$1,797,835**. This base number was increased by 3.0% the expected growth for FY 2025 and increased 3% each subsequent year for a total **non-car rental concessions base of \$5,723,636**.

**Table 2: Projected Gross Receipts for “All Other” (Non-Car Rental Concessions)**

Fiscal Year	Projected Expenditures
FY 2025	\$1,851,770
FY 2026	\$1,907,323
FY 2027	\$1,964,543
<b>Total</b>	<b>\$5,723,636</b>

**A. Determination of Market Area**

The market area is defined by the geographical area in which the substantial majority of firms which seek to do concessions business with the airport are located and the geographical area in which the firms which receive the substantial majority of concessions-related revenues are located.

Based upon this definition and information available to the Airport, the market area for “all other” or non-rental car concessions is the state of Florida.

**II. Methodology used to Calculate Overall Goal****A. Goods and Services**

The Airport can meet the percentage goal by including the purchase from ACDBEs of goods and services used in non-car rental concessions business conducted at the airport. The Airport, and the non-car rental concessionaires at the airport, should 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.

## B. Management Contract or Subcontract

The Airport can meet the percentage goal by including any non-car rental concessions operated through a management contract or subcontract with an ACDBE. The Airport Commission, and the non-car rental concessions 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 airport's percentage goal is calculated. However, the dollar amount of a management contract or subcontract with a non-ACDBE and the gross revenue of business activities to which the management contract or subcontract pertains will not be added to this base in either the numerator or denominator.

## C. Step 1: 23.51 (c)

The Airport determined the base figure for the relative availability of ACDBEs other than car rentals. The base figure was calculated as follows:

The Step 1 DBE Base Figure was determined by dividing the number of ACDBE firms available by the total number of firms available to determine the relative availability of ACDBEs for each concession type as indicated in **Table 3** below.

**Table 3: Determination of Relative Availability of ACDBEs (Non-Car Rental)**

Concession Type	NAICS	DBEs	All Firms	Availability	NAICS Dollars	ACDBE Dollars
Gift, Novelty & Souvenir Stores	453220			10.0%	\$ 2,179,703	\$217,970
Banking	522110	0	5,024	0.0%	\$ 9,869	\$0
Advertising	541850			100.0%	\$ 906,388	\$906,388
Food & Beverage	722515			20.0%	\$ 2,588,931	\$517,786
Baggage Cart Rental	812990	14	2,792	0.5%	\$ 38,745	\$194
<b>Total</b>					<b>\$5,723,636</b>	<b>\$1,642,339</b>
<b>Step 1 Base figure</b>						<b>28.69%</b>

Source:

1. Florida UCP DBE Directory, August 2024.
2. US Census Bureau, 2022 County Business Patterns.

***Concessions that are shaded do not have opportunities. Their projected participation was used as availability.***

The Step 1 base goal for “all other” (i.e. non-car rental) ACDBEs is **28.69%**.

#### D. Step 2: 23.51(d)

After calculating a base figure of the relative availability of ACDBEs, the Airport examined evidence to determine whether or not the base figure needs to be adjusted in order to arrive at the overall goal.

The data used to determine the adjustment to the base figure was:

##### 1. Past participation

The Airport evaluated the current capacity of ACDBEs to perform work in the concessions program by measuring the volume of work ACDBEs have performed in the past.

The historical ACDBE accomplishments at the Airports in recent years were examined relative to the above consideration. Specifically, the annual “Uniform Report of ACDBE Participation” for the reporting periods listed below was assessed. Notice the annual ACDBE percent accomplishment for each year, and the annual median for the periods reported.

**Table 4: St. Pete-Clearwater International Airport ACDBE Accomplishments for FY 2021-FY 2027**

Non-Car Rental			
Report Period	ACDBE Goal	ACDBE % Achieved	Achieved Over/Under
FY 2021	9.20%	12.55%	3.35%
FY 2022	9.20%	19.73%	10.53%
FY 2023	9.20%	28.94%	19.74%
Median	9.20%	19.73%	10.53%

Source: Uniform Report of ACDBE Participation, St. Pete-Clearwater International Airport

The median ACDBE accomplishment for the reporting periods as shown above is **19.73%**, compared to the Step 1 DBE base figure for the airport of **28.69%**.

#### E. Adjustment of the Step 1 Goal

The Airport chose to adjust the base figure using past participation by ACDBEs indicated in Table 4. The Airport adjusted the Step 1 ACDBE base figure of 28.69% by averaging it with the median ACDBE accomplishment of 19.73% which results in an adjusted overall goal of **24.21%**.

### **III. Consultation with Stakeholders (23.43)**

Before establishing the ACDBE Non-Car Rental goal, the Airport provided opportunity for consultation with small, minority and women-owned business development organizations including current airport concessionaires. The opportunity was not limited to these persons or groups. The intent and purpose were to attempt to obtain information concerning the availability of disadvantaged and non-disadvantaged businesses, the effects of discrimination on opportunities for ACDBEs, and the Airport's efforts to establish a level playing field for the participation of ACDBEs. Prior to submitting this new goal to the FAA Civil Rights office, the Airport conducted a virtual stakeholder meeting on September 13, 2024 via GoToWebinar. Questions and answers from the meetings are provided as an attachment to this document.

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

The Airport will meet the maximum feasible portion of its overall goal by using race-neutral means of facilitating ACDBE participation. The Airport uses the race-neutral measures below to increase ACDBE participation. The Airport understands that it will be expected to actually take these steps, and this is not merely a paper exercise.

1. Locating and identifying ACDBEs and other small businesses who may be interested in participating as concessionaires under 49 CFR Part 23;
2. Notifying ACDBEs of concession opportunities and encouraging them to compete, when appropriate;
3. When practical, structuring concession activities so as to encourage and facilitate the participation of ACDBEs;
4. Ensuring that competitors for concession opportunities are informed during pre-solicitation meetings about how the sponsor's ACDBE program will affect the procurement process;
5. Providing information concerning the availability of ACDBE firms to competitors to assist them in obtaining ACDBE participation.

The Airport proposes a race-conscious goal of 13.68% and a race-neutral goal of 10.53%, for a total of 24.21%. The reason for this projected split is that the historical information on ACDBE participation showed that the amount by which the goal was over-achieved was 10.53%.

If the Airport projects that race-neutral measures, standing alone, are not sufficient to meet an overall goal, it will use the following race-conscious measures to meet the overall goal:

1. Establish concession-specific goals for particular concession opportunities;
2. Negotiate with potential concessionaires to include ACDBE participation through direct ownership arrangements or measures, in the operation of the concession; and
3. With prior FAA approval, other methods that take a competitor's ability to provide ACDBE participation into account in awarding a concession.

In order to ensure that the ACDBE program will be narrowly tailored to overcome the effects of discrimination, if the Airport uses concession-specific goals, it will adjust the estimated breakout

of race-neutral and race-conscious participation as needed to reflect actual ACDBE participation (see 26.51(f)) and will track and report race-neutral and race conscious participation separately. For reporting purposes, race-neutral ACDBE participation includes, but is not necessarily limited to the following: ACDBE participation through a prime contract that an ACDBE obtains through customary competitive procurement procedures, ACDBE participation through a subcontract on a prime contract that does not carry ACDBE goal; ACDBE participation on a prime contract exceeding a concession specific goal; and ACDBE participation through a subcontract from a prime contractor that did not consider a firm's ACDBE in making the award.

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

**Resource Documents:**

1. Florida UCP DBE Directory
2. U.S. Census County Business Patterns
3. Uniform Report of DBE Awards or Commitments and Payments



## **Appendix B: St. Pete-Clearwater International Airport – Web Conference September 13, 2024**

**Summary of Meeting:** Wilfred Nixon, of Ken Weeden & Associates, gave a PowerPoint presentation that covered and explained the following:

- Background, purpose, and goal requirements of the FAA-ACDBE program.
- Overview of the ACDBE goal methodology and basic requirements, such as use of most refined data, identification of a normal market area, and employment of a two-step process in establishing the overall 3-year DBE goals.
- Calculation of the base-figure goal (step 1), and adjusted goal (step 2), through “weighting” and consideration of indicators of “capacity”.

### **Stakeholder Meeting Attendee List**

<b>Name</b>	<b>Company/Organization</b>
Yvette Aehle	St. Pete-Clearwater International Airport
Christopher McKinney	St. Pete-Clearwater International Airport
Alex Cardetti	Perez of Florida, Inc
Karnardo Garnett	Legacy Concessions, LLC
Wanda Gilbert	WFG Solutions-WANDA’S INC
Villard Houston	V. H. JR & ASSOCIATES INC
Nelson Mendez	Rico Foods Company DBA Mr. Cappuncino
Arielle Richardson	4R Services
Albert Rodriguez	Ambient Technologies, Inc.
Wilfred Nixon	Ken Weeden & Associates
Stephania Pierre	Ken Weeden & Associates

### **Questions/Comments:**

1. **Where are opportunities made available?**  
<https://www.pinellascounty.org/purchase/>
2. **Can I get a list of Contacts for current concessionaires?**  
Yes, please contact: Christopher McKinney [cmckinney@pinellascounty.org](mailto:cmckinney@pinellascounty.org)
3. **Will the presentation be made available?**  
Yes, please contact: Christopher McKinney [cmckinney@pinellascounty.org](mailto:cmckinney@pinellascounty.org)