

Florida Keys Marathon Airport



DBE Goal Methodology Report

FAA FY 2014 - 2016

October 1, 2013 - September 30, 2016



MONTGOMERY
CONSULTING GROUP

PLANNING | ENVIRONMENTAL | ENGINEERING
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**FAA FY 2014 - 2016 METHODOLOGY FOR DETERMINING DBE GOALS
FLORIDA KEYS MARATHON AIRPORT**

DBE GOAL PROCESS

In FAA Fiscal Year (FY) 2011 (October 1, 2010 to September 30, 2011), the Florida Keys Marathon Airport (Airport) began submitting a multi-year Disadvantaged Business Enterprise (DBE) goal to the Federal Aviation Administration (FAA). The last goal period covered the three-year timeframe of FAA FY 2011 – 2013 (October 1, 2010 to September 30, 2013). Prior to FAA FY 2011, annual goals were submitted to FAA.

Before updating the multi-year goal for the next three year period of FAA FY 2014 – 2016, area certified DBE firms, minority and small business organizations and trade groups are consulted to solicit information and input concerning the following:

- The availability of disadvantaged and non-disadvantaged businesses;
- The effects of discrimination on opportunities for DBEs; and
- The Airport's efforts to establish a level playing field for the participation of DBEs.

The overall goal period for the Monroe County Board of County Commissioner's (Monroe County) Disadvantaged Business Enterprise Program at the Florida Keys Marathon Airport for FAA FY 2014 – 2016 begins on October 1, 2013 and ends on September 30, 2016 covering FAA FY 2014, 2015, and 2016. The overall goal for FAA FY 2014 - 2016 has been developed using the methodologies described in CFR 49, Part 26 as follows:

The Airport's DBE Goal for FAA FY 2014 - 2016 is as follows: 12.6% of the federal financial assistance that the Airport will expend in DOT-assisted contracts. Given that the amount of DOT-assisted contracts the Airport expects to encumber during FAA FY 2014 - 2016 is \$681,409. The Airport has set a goal of expending \$85,857 with DBEs during the FAA FY 2014 - 2016 timeframe.

METHODOLOGY

The methodology described in 49 CFR 26.45(c) (1) was used to determine the base figure for the relative availability of DBEs. A determination of the FAA FY 2014 - 2016 goal setting process includes identifying a base figure for the relative availability of DBEs based on demonstrable evidence of the availability of ready, willing and able DBEs as compared to the availability of all businesses participating on DOT-assisted contracts.

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The first step of the goal setting process includes creating a base figure for the relative availability of ready, willing and able DBEs in the Airport's normal market area. Specifically, the market area is based on where the substantial majority of bidders, both successful and unsuccessful bidders, are located for the anticipated types of work that are to be performed in the coming three-year timeframe, and where the Airport has previously spent the substantial majority of funding for similar projects. **Appendix 1** identifies the market area providing a breakdown of the number of bidders per geographical location (county), the value of awarded contracts per area and the percentage of dollars awarded by county.

Reviewing the type of work anticipated in the Airport's capital improvement program for the three years (FAA FY 2014 - 2016), the location of previous bidders on similar-type projects, the normal market area for the Florida Keys Marathon Airport includes the following Florida counties: Hillsborough County, Miami-Dade County, Monroe County, Palm Beach County, Pinellas County, and St. Johns County. Within the FAA FY 2011 - 2013 timeframe, 100% of federal dollars were awarded in this market area.

The market area reflects the type of projects (i.e., rehabilitation/improvement projects) anticipated during the FAA FY 2014 - 2016 timeframe; thus, tailoring the market area to the anticipated FAA-funded projects expected during the multi-year timeframe. Planning and engineering services are expected to be contracted through the retained consulting firms for the airport. Separate requests for professional services are not anticipated for each specific project. The market area identified includes areas where construction and equipment providers are anticipated to be based for the upcoming three-year period.

The second step of the goal setting methodology is to make adjustments to the base figure, relying on an examination of additional evidence including historical DBE participation, experience, local expertise, the consultation process and anticipated changes in FAA-assisted contracting over the upcoming years. The following pages detail **Step 1** and **Step 2** in the DBE goal setting process.

FY 2014 - 2016 PROJECTS

The projects anticipated in FAA FY 2014 - 2016 are representative of similar projects that have occurred over the past few years at Florida Keys Marathon Airport. The market area (discussed above) represents the expected market area for bidders for the expected FAA FY 2014 - 2016 projects.

Based on the Airport's capital improvement plan summary, provided by the Airport's engineering consultant, the projects listed in the following table are anticipated during FAA FY 2014 - 2016 at the Florida Keys Marathon Airport to receive federal financial assistance.

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**Anticipated Federal Projects
Florida Keys Marathon Airport
FAA FY 2014 - 2016**

Project Name	Estimated Total Federal Budget
Obstruction Removal – RPZ/Runway 25 – Design & Construction	\$ 411,409
Runway 7/25 Rehabilitation – Design & Permitting	\$ 90,000
Master Plan Update	\$ 90,000
PAPI’s – Design, Permit, & Construct	\$ 90,000
TOTAL:	\$ 681,409

The most refined data available within the North American Industry Classification System (NAICS) 2012 codes was used to identify the various components for the upcoming FAA FY 2014 - 2016 projects. The percentage value for each type of NAICS code description was estimated based on the FAA FY 2014 - 2016 project types. Then, the number of available DBE firms and the number of all firms in the Airport’s market area was determined for each respective NAICS code. To ensure the calculations were relevant, only firms that are likely to do business at the Airport in the upcoming years were identified.

The overall active contractors suitable for projects planned in FAA FY 2014 - 2016 are determined from the NAICS codes listed in the following table.

**Estimated Percentage of Value by NAICS Code
of Projects to be Contracted
Florida Keys Marathon Airport
FAA FY 2014 - 2016**

NAICS Code	Description	Estimated % of Value of by Category
237310	Highway, Street, and Bridge Construction	59 %
541330	Engineering Services	41 %
TOTAL:		100 %

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STEP 1 – DETERMINING A BASE FIGURE REPRESENTING DBE RELATIVE AVAILABILITY

The 2011 Census Bureau's County Business Patterns data was used to estimate the number of contractors per NAICS code in the market area. The Florida Unified Certification Program (FL UCP) DBE directory was used to estimate the number of ready, willing and able DBE contractors per NAICS code in the market area.

The base figure was calculated by counting the DBEs detailed in **Appendix 2** (numerator) and the census bureau establishments detailed in **Appendix 3** (denominator) for the same NAICS codes within the Airport's normal market area. **Appendix 2** reflects the DBE firms operating in the market area. **Appendix 3** reflects the DBE and non-DBE businesses operating in the same market area. These percentages were then measured against the estimate value per each NAICS code to determine the expected DBE percent participation per NAICS Code.

A **Step 1** Base Figure for the federal projects that are anticipated to be contracted during the 3-year timeframe based on the described methodology is detailed below.

**Step 1 – Base Figure Development
Projects to be Contracted
Florida Keys Marathon Airport
FAA FY 2014 - 2016**

NAICS Codes	NAICS Code Description	Estimated Value of Projects	Expected DBE Participation
237310	$\frac{\text{Highway, Street \& Bridge Construction DBE Contractors in Market Area}}{\text{Highway, Street \& Bridge Construction Contractors in Market Area}} = \frac{49}{149} = 0.33$	x 0.59	= 0.195
541330	$\frac{\text{Engineering Service DBE Firms in Market Area}}{\text{Engineering Service Firms in Market Area}} = \frac{107}{1,471} = 0.07$	x 0.41	= 0.029
TOTAL STEP 1 – BASE FIGURE – PROJECTS TO BE CONTRACTED:			0.224 X 100% = 22.4 %

STEP 2 – EXAMINATION OF AVAILABLE EVIDENCE TO DETERMINE WHAT ADJUSTMENT, IF ANY, IS NEEDED TO THE BASE FIGURE

49 CFR Section 26.45 (d) and the goal and methodology guidelines contained on the Office of Small and Disadvantaged Business Utilization’s (OSDBU) website identify numerous examples of the various types of data to examine in order to adjust the **Step 1** Base Figure to narrowly tailor the goals to the precise local market. **Step 2** is intended to adjust the “base figure” percentage from **Step 1** to reflect, as accurately as possible, the DBE participation the Airport would expect in the absence of discrimination.

The factors listed as follows are considered in order to determine whether an adjustment to the **Step 1** Base Figure is appropriate for the FAA FY 2014 - 2016 goals. These guidelines include:

A. DISPARITY STUDY

A disparity study is currently underway in Miami-Dade County; however the results of this study are not yet public and will not impact the determination of the DBE Goals for the Florida Keys Marathon Airport during the FAA FY 2014 - 2016 timeframe. No known disparity studies have been conducted in Monroe County that would impact this methodology process.

B. HISTORICAL DBE PARTICIPATION

Past DBE participation is based on the analysis of grants similar to anticipated FAA FY 2014 - 2016 Florida Keys Marathon Airport projects. **Appendix 4** provides historical information on DBE participation at the Florida Keys Marathon Airport. Adjustments based on historical DBE participation for FAA FY 2010, FAA FY 2011, FAA FY 2012, and FAA FY 2013 were specifically considered and are analyzed in the following table.

**Historical DBE Participation
Florida Keys Marathon Airport
FAA FY 2014 - 2016**

Year	DBE Goal	Actual DBE Percentage	Race Neutral/Conscious Over/Under Goals
2013	12.8 %	5.6 %	- 7.2 %
2012	12.8 %	0.0 %	- 12.8 %
2011	12.8 %	0.0 %	- 12.8 %
2010	16.2 %	0.0 %	- 16.2 %
Historical Average by Value of Federal Grants		2.8 %	

Source: See Appendix 4

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The four (4) years of historical DBE participation yields an actual participation average of 1.4%, which is used in this analysis. The base figure is adjusted to account for the historical average past DBE participation at the Airport. This calculation is illustrated in the following table.

**Step 2 – Base Figure Adjustment
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Base Figure from Step 1 =	22.4 %
Historical Average DBE Participation =	<u>2.8 %</u>
Average Base & Historical =	12.6 %
Proposed Overall Goal =	12.6 %

The adjusted Step 2 goal is 12.6% of the total federal dollars likely to be contracted in the FAA FY 2014 - 2016.

C. OTHER FACTORS

Other additional sources of information considered in adjusting the **Step 1** Base Figure include the consultation process with the following organizations (**Appendix 7**):

- National Association of Women Business Owners
- NAACP - Miami Branch
- Southern Florida Minority Supplier Development Council
- Minority Business Development Agency
- Minority Professional Network

Based on consultation, these organizations did not identify any information about past discrimination in the following areas:

- Public contracting;
- Discrimination in private contracting;
- Discrimination in credit, bonding or insurance;
- Data on employment, self-employment, training or union apprenticeship programs; and/or
- Data on firms' formation.

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Importantly, the Airport holds a public consultation meeting to discuss the goal setting methodology and proposed FAA FY 2014 - 2016 goal. The purpose of the meeting is to get input from certified DBEs and community members during the goal setting process. The consultation meeting includes discussions on:

- DBE Eligibility
- Recommended Project Goal for FAA FY 2014 - 2016
- DBE Certification and Florida Unified Certification Process
- Project Bidding Process
- Prompt Payment Mechanism
- Comments on Proposed Goals

There is not have sufficient reliable information about the characteristics of the DBE firms including size, age, past experience, bonding, or insurance available in its local market area to make further adjustments in **Step 2**. Thus, no further **Step 2** adjustments are made based on “other factors” from the consultation process.

PUBLIC PARTICIPATION

The Airport publishes notices of DBE goals in three (3) local newspapers, *Florida Keys Keynoter*, *The Reporter* and *The Key West Citizen*. The notices list the proposed DBE goals for FAA FY timeframe. The notice informs the public that the proposed goal and its rationale are available for inspection during normal business hours at the Airport Manager’s Office for 30 days following the date of the notice, and informs the public that the Airport is accepting comments on the goals for 45 days from the date of the notice. The notice includes addresses to which comments can be sent and the addresses where the document can be reviewed. The goal methodology will also be available for review by the public on the Airport’s DBE website at <http://www.keywestairportdbe.net>. **Appendix 5** provides documentation of the Airport's public notice (advertisement) required under 26.45 (g) (2).

One (1) written comment was received in support of unbundling larger contracts so that smaller firms and DBEs could participate as prime contractors on airport projects. The Airport’s response to this comment is that they will consider unbundling or phasing larger contracts to encourage small business and DBE participation.

A goal setting meeting was held on July 30, 2014 at the Key West International Airport, which was advertise in the three (3) local newspapers indicated above. Meeting minutes are attached in **Appendix 5**. The presentation provided at the meeting is available on the Airport’s DBE website at <http://www.keywestairportdbe.net>.

SUMMARY

Based on review of the factors described in sections A, B and C, a Step 2 adjustment was made to the Step 1 base figure to narrowly tailor the goals to reflect local conditions. The overall **FAA FY 2014 - 2016 DBE Goal** is **12.6%** for the anticipated **\$681,409** in federal monies expected for the three-year timeframe at the Airport, providing a total goal value of **\$85,857**. Florida Keys Marathon Airport will evaluate each federally-funded project to establish a project DBE goal(s) and monitor the actual DBE participation on the upcoming federal projects in order to meet and/or balance the overall three-year DBE goal.

BREAKOUT OF RACE-NEUTRAL AND RACE-CONSCIOUS PARTICIPATION

The recent historical results of DBE participation were reviewed to determine the potential need for race-conscious goal setting. Race-neutral efforts (i.e., not establishing contract goals or advertising DBE goals) have historically not been successful in the absence of defined DBE goals, as the race-neutral statistics illustrate in **Appendix 6**. These statistics illustrate that for the past four years, the DBE participation has not met the advertised DBE goals established by an average variance of **-11.2%**. This variance is used to establish the specific race-neutral and race-conscious goals.

The Disadvantaged Business Enterprise Liaison Officer (DBELO) will carefully monitor the award and actual DBE participation and adjust future DBE goals to consider race-neutral and race-conscious participation accordingly. It is the goal of the Airport to meet the maximum feasible portion of its DBE goals by using race-neutral means of facilitating DBE participation. Based on the recent results, the Airport estimates in meeting the **Overall DBE Goal for FAA FY 2014 – 2016 of 12.6%**, it will obtain **0.0% from race-neutral means** and **12.6% through race-conscious means**.

The Airport uses the following race-neutral means to increase DBE participation:

- Inform and communicate to DBEs the County’s contracting procedures and specific contracting opportunities by planning and participating in training seminars and community outreach activities for the purpose of informing potential contractors of available business opportunities.
- Maintain a current DBE directory as a source of identifying all DBEs currently certified by the Florida UCP, and make available copies of the Florida UCP DBE directory to prospective contractors desiring contract information for affected projects.
- E-mail copies of contract notices to firms certified by the Key West International Airport and Florida Keys Marathon.
- Ensure notices of contracting opportunities are published in a newspaper of general circulation in the area.

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- Assist in identifying problems confronting DBEs in performing County contracts and work diligently to arrive at acceptable solutions.
- Present workable procedures to facilitate the receipt of timely progress payments to DBEs for work completed, following such request for payment.
- Encourage DBE attendance at pre-bid/pre-proposal meetings.
- Provide assistance to DBEs during the solicitation or bid period for any project, and assist with any explanation of documents, including language barriers, that may exist.

In order to ensure that the Florida Keys Marathon Airport DBE program will be narrowly tailored to overcome the effects of discrimination, the following actions will be taken when contract goals are used:

- Adjustments will be made to the estimated breakout of race-neutral and race-conscious participation as needed to reflect actual DBE participation (49 CFR, Part 26.51(f)).
- The DBELO will separately track and report race-neutral and race conscious participation.
- Data will be maintained on DBE achievements in those contracts with and without contract goals, respectively.

SMALL BUSINESS PARTICIPATION

Recognizing that the Airport's DBE Program goals should be met through a mixture of race conscious and race neutral methods and, that by definition, DBE firms are small businesses; the Airport has included a Small Business Element (SBE) into the current DBE policy in accordance with applicable law. The Airport is including the small business element to facilitate competition by and expand opportunities for small businesses in Airport projects. The Airport is committed to taking all reasonable steps to eliminate obstacles to small businesses that may preclude their participation in procurements as prime contractors/consultants or subcontractors/subconsultants. The Airport meets its objectives using a combination of the following methods and strategies:

- a) **Unbundling:** The Airport, where feasible may "unbundle" projects or separate large contracts into smaller contracts, which may be more suitable for small business participation. The Airport will determine the feasibility of unbundling by reviewing the grant application for the federal project, and determining the work elements that are likely to be grouped for construction and/or purchase. The Airport will consider the economic feasibility, constructability, and schedule impacts in addition to providing greater opportunities for small business participation in the assessment of unbundling the projects. Similarly, the Airport will encourage its prime contractors and prime consultants to unbundle contracts to facilitate participation by small businesses.
- b) **Outreach and Technical Assistance:** The Airport advertises contracting opportunities through various outlets, including local newspapers. The Airport addresses the SBE element and SBE

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opportunities at its annual DBE/SBE outreach meeting. The outreach meeting incorporates the Airport's commitment to the SBE element and encourages participation of SBE firms in addition to DBE firms.

As described above, the Airport currently uses a variety of methods to facilitate small business participation. In each FAA-assisted contract, the DBELO document the method in which the small business element will be implemented (i.e. unbundling and/or outreach).

Certification and Verification Procedures - The Airport accepts the following certifications for participation in the small business element of the Airport's DBE Program with applicable stipulations:

1. Florida Unified Certification Program (UCP) Certification – Currently valid DBE certification by a certifying UCP member which stipulates that a firm has been determined to meet all the requirements in accordance with 49 CFR Part 26. All certification determinations are evidenced by a letter of DBE certification issued by a UCP certifying agency. Applicant shall submit a copy of the certification letter and verification of status on the current Florida UCP database.
2. State of Florida Department of Management Services Certification – Currently valid certification by State of Florida Department of Management Services. Applicant shall submit a copy of certification letter/certificate and two years of business tax returns or a copy of the business' current balance sheet if the business has been established less than twelve months, in order to demonstrate that the business meets federal Small Business Administration (SBA) size standards for the relevant NAICS code;
3. City / County / Authority Certification - Currently valid city, county and/or authority government certification indicating eligibility to participate in women, minority and/or veteran's procurements. Applicants will submit a copy of the certification letter/certification and two years of business tax returns or a copy of the business' current balance sheet if the business has been established less than twelve months, in order to demonstrate that the business meets federal Small Business Administration (SBA) size standards for the relevant NAICS code; and
4. SBA 8(a) Business Development Certification – Federal 8(a) certification as described in 13 CFR Parts 121 and 124. Applicants will submit a copy of the certification letter/certification and two years of business tax returns or a copy of the business' current balance sheet if the business has been established less than twelve months, in order to demonstrate that the business meets federal Small Business Administration (SBA) size standards for the relevant NAICS code.

Assurances - The Airport makes the following assurances regarding the small business element (SBE) of the Airport's DBE Program:

- a) The DBE Program, including its small business element is not prohibited by state law;

- b) Certified DBEs that meet the size criteria established under the DBE Program are presumptively eligible to participate in the small business element of the DBE Program;
- c) There are no geographic or local preferences or limitations imposed on FAA-assisted contracts and the DBE Program is open to small businesses regardless of their location;
- d) There are no limits on the number of contracts awarded to firms participating in the DBE Program;
- e) Reasonable effort will be made to avoid creating barriers to the use of new, emerging, or untried businesses; and
- f) Aggressive steps will be taken to encourage minority-owned and women-owned firms participating in the small business element of the DBE Program that are eligible for DBE certification to become certified.

APPENDIX 1

**Florida Keys Marathon Airport
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Historical Market Area Detail**

Location of Firms (County)	Historical Federal Dollars Spent FAA FY 2011 - 2013	Percentage of Dollars Spent	Number of Firms
Hillsborough County, FL	\$90,275	27%	2
Miami-Dade County, FL	\$82,635	25%	5
Monroe County, FL	\$29,609	9%	2
Palm Beach County, FL	\$76,923	23%	7
Pinellas County, FL	\$0	0%	1
St. Johns County, FL	\$52,224	16%	1
Mecklenburg County, NC	\$0	0%	1
TOTAL	\$331,665	100%	19

Source: Montgomery Consulting Group detail for Uniform Report Worksheet, 2011 - 2013

APPENDIX 2

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Estimate of Total DBE Firms
Operating in Market Area**

NAICS Code	Description	Hillsborough County	Miami-Dade County	Monroe County	Palm Beach County	Pinellas County	St. Johns County	Total
237310	Highway, Street & Bridge Construction	7	21	0	13	5	3	49
541330	Engineering Services	41	35	1	19	9	2	107
TOTAL								156

Source: 2014 State of Florida UCP DBE Directory via FDOT Searchable Database

APPENDIX 3

**Florida Keys Marathon Airport
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 Estimate of Total Firms (DBE and Non-DBE)
 Operating in Market Area**

NAICS Code	Description	Hillsborough County	Miami-Dade County	Monroe County	Palm Beach County	Pinellas County	St. Johns County	Total
237310	Highway, Street & Bridge Construction	29	53	0	36	28	3	149
541330	Engineering Services	392	473	20	336	205	45	1,471
TOTAL								1,620

Source: U.S. Census Bureau 2011 County Business Patterns

APPENDIX 4

**Florida Keys Marathon Airport
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Historical DBE Participation**

Fiscal Year	Total	DBE Goal	DBE Actual	DBE Variance
2013	\$207,460	12.8 %	\$11,600 5.6%	- \$14,955 -7.2%
2012	\$67,823	12.8%	\$0 0.0%	- \$8,681 - 12.8%
2011	\$0	12.8%	\$0 0.0%	\$0 0.0%
2010	\$142,379	16.2%	\$0 0.0%	- \$23,065 - 16.2%
4-YR Total	\$417,622		\$11,600	- \$46,701
4-YR Average		13.6 %	2.8 %	- 11.2 %

Source: Uniform Report of DBE Commitments/Awards and Payments (DOORS) Reports

APPENDIX 5

**Florida Keys Marathon Airport
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Documentation of Advertisements of DBE Goals
Public Comments Received
Minutes of Goal Setting Meeting**

APPENDIX 6

**Florida Keys Marathon Airport
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Race Conscious / Race Neutral Historical Information**

Fiscal Year	Actual Total DBE Participation	Actual Race Conscious Participation	Actual Race Neutral Participation	DBE Variance
2013	5.6 %	5.6 %	0.0 %	- 7.2 %
2012	0.0 %	0.0 %	0.0 %	- 12.8 %
2011	0.0 %	0.0 %	0.0 %	0.0 %
2010	0.0 %	0.0 %	0.0 %	- 16.2 %
Average by Value of Federal Grant	2.8%	2.8%	0.0%	-11.2%

Source: Appendix 4

**APPENDIX 7
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Consultation Information**

In an effort to solicit input in establishing DBE goals, the following email was sent to the:

- Minority Business Development Agency (admin@miamimbdacenter.com)
- Minority Professional Network (Support@MPNmail.com)
- NAACP - Miami Branch (swillis@miami-dadenaacp.org)
- National Association of Women Business Owners - Miami (info@nawbomiami.org)
- Southern Florida Minority Supplier Development Council (info@sfmsdc.org)

No responses of note were provided from these organizations.

Dear Sir/Madam:

Our firm is assisting the Key West International and Florida Keys Marathon Airports in consulting with construction industry groups, community organizations, and minority and women's groups to obtain information concerning the availability of disadvantaged and non-disadvantaged businesses, the effects of discrimination on opportunities for Disadvantaged Business Enterprises (DBEs), and the Key West International and Florida Keys Marathon Airports' efforts to establish a level playing field for the participation of DBEs in construction in order to establish a DBE Goal for construction for up-coming federally-funded projects at the Key West International and Florida Keys Marathon Airports.

We ask for your organization's input. Please respond to the following questions:

- 1. What is the estimated total membership and/or local chapter membership of your organization?*
- 2. Does your organization represent minority and/or women businesses in the construction industry?*
- 3. If so, approximately how many members of the total are minority and/or women businesses?*
- 4. Does your organization identify if members are minority and/or women businesses, and/or certified DBEs in your organization's directory?*
- 5. Please share any awareness of the effects of discrimination on business opportunities for DBEs. (feel free to add comments)*
 - a. To your knowledge are DBEs treated equal to non-DBEs in bidding opportunities?*
 - b. To your knowledge are DBEs treated equal to non-DBEs in ability to get and maintain insurances and bonding required for projects?*

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- c. To your knowledge are DBEs treated equal to non-DBEs in ability to secure banking lines or credit for business operation?*
- d. To your knowledge is there a stigma associated with being a DBE as to the expected quality of work?*
- 6. Do you think there is a "level playing field" between DBEs and non-DBEs in the construction industry?*
- 7. What suggests might you offer to the Key West International and Florida Keys Marathon Airports in "leveling the playing field" for participation of DBEs on construction projects?*

Thank you for your time. Your input is valued and appreciated.

Best regards,

*Casey L. Adamson
Montgomery Consulting Group, Inc.
501 S. New York Avenue, Suite 210
Tel: 407-539-7030, ext. 18, Fax: 407-539-7035
E-mail: casey.adamson@mcgi-us.com
Web: www.mcgi-us.com*