

**Little Rock Municipal Airport Commission  
Disadvantaged Business Enterprise Program  
2011 Annual Goal**



**Thomas W. Clarke, Director – Properties, Planning, and Development  
August 1, 2010**

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2011 Annual Goal**

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# Little Rock Municipal Airport Commission Disadvantaged Business Enterprise Program 2011 DBE Goal

## Overview

The Little Rock Airport Commission (Commission) seeks to implement a capital improvement plan which includes an enhancement to airport operations and facility improvements by carrying out the projects identified in this section. Federal grants from the Airport Improvement Program are expected to provide funds for these projects. In compliance with the Department of Transportation's Participation by Disadvantaged Enterprises (DBE) in Department of Transportation Programs (49 CFR 26) the Little Rock Airport Commission will administer its DBE Program.

During the 12 month period of October 1, 2010 to September 30, 2011 the Commission expects to award approximately \$49,183,692.00 for the nine projects listed below. Based on scope of the projects, nine projects or \$49,183,692.00 in grant funds has subcontracting possibilities.

<u>Project</u>	<u>Dollar Amount</u>
<b>Projects with Potential for DBE Participation</b>	
Airfield Signage Rehab & West Airfield Lighting Improvements – Phase 2 Construction	\$ 3,180,000.00
ARFF Station Rehabilitation – Phase 2	\$ 2,400,000.00
West Airfield Drainage Improvements – Phase 2	\$ 1,500,000.00
PAPI Installation Runway 36, 4L 22R & 4R	\$ 780,000.00
Runway 22L Fencing & Embankment Stabilization – Phase 2	\$ 850,000.00
Rehabilitate TW Alpha, Kilo, Lima, Phase 1 Design	\$ 240,000.00
Terminal Redevelopment – Phase 1	\$20,000,000.00
Airfield Maintenance Facility – Phase 2	\$ 8,213,692.00
In-line BHS/EDS Equipment – Phase 2	\$12,020,000.00
<b>SUBTOTAL</b>	<b>\$49,183,692.00</b>

The Commission's overall DBE goal for FY 2011 is 9% of funds expended on DOT federally assisted projects. In anticipation of receiving DOT grants for projects in the amount of \$49,183,692.00 for federally assisted contracts, the Commission forecasts meeting the DBE goal by expending \$4,426,532.28 with DBE firms.

## **Methodology**

The identification of FY 2011's potential projects was the Commission's initial step in determining its DBE goal. Professional service firms are needed for design and construction management services. The construction funds will be used for taxiway repairs, airfield signage, ARFF station rehabilitation, security enhancements, improving airport drainage, and terminal renovation, including an in-line baggage handling system.

A review of the historical data from FY 08 and part of FY 09 bidders is available to identify the market area. The Commission began collecting bid data for the FY 05 year to reflect the demographics of all bidders. This data shows that the majority of bidders are from Arkansas, and, depending on the type of bid, the same bidders are recorded on similar bids. This information allows the Commission to consider the data from all bidders, not just that of the successful awards.

A review of past bidders in FY 08 and 09 indicates that 96% or 27 of the 28 prime and subcontractors were from the State of Arkansas, along with 93% (13 of 14) of DBEs. The combined total of all bidders for both years represents a dollar value of \$16.7 million from these contracts being awarded to firms to perform work in Arkansas and of this amount \$8.6 million will be expended by Arkansas firms through the awards from the 2008 fiscal year. Given that the majority of all contracts were awarded to Arkansas firms, it was determined that the State of Arkansas was the relevant market area. This finding is consistent with past history.

In developing the methodology, the review also involved implementation of any subsequent adjustments needed, if any, for race neutral considerations. The race neutral considerations are detailed in that particular section of this process.

The US Department of Commerce's NAICS codes were used to appropriately segregate the project work by discipline. Utilizing the US Census Bureau data, the Commission identified the number of available firms to compete for the proposed work within the State of Arkansas in the 2007 County Business Patterns (CBP), the latest edition.

The Certified DBE List for the State of Arkansas (issued July 20, 2010 by the Arkansas Highway and Transportation Department, or AHTD) was used to identify the number of ready, willing and able disadvantaged businesses. There was an increase in the number of DBE certified firms in the NAICS codes represented in the methodology for FY 11 (27,834) compared to the number of firms in FY 10 (702), primarily due to the number and type of projects planned for FY 2011 (9) versus FY 2010 (7).

Areas of work for potential DBEs were segregated by NAICS with the comparable non-DBE firms in Step One: Base Figure on the following page. The chart identifies the number of firms by 6 digit codes to better isolate the firms with some degree of specifics. Information from the latest CBP statistics was used. The number of firms from each project was added for a total sum. The same process was performed on the DBEs from the AHTD List. The relative availability of firms for the Base Figure was calculated by dividing the DBE firms by the CBP firms. The numerator was derived from the number of certified DBE firms. The denominator is representative of the firms as indicated by the CBP.

**Step One:**  
Projects

**Base Figure (Average of the availability for all three projects)**  
\*2007 County Business Patterns - US Census Bureau and \*\*AHTD DBE List (07-20-10)

**Airfield Signage Rehab Phase 2**

\$3,180,000.00

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		All Firms	DBE Firms
532412	Construction Equipment Rental & Leasing	70	1
238210	Electrical Contractors	716	4
237990	Heavy & Civil Engineering	46	3
238320	Construction	210	4
238110	Paint & Wall Covering Contractors	215	41
238910	Poured Concrete Foundation & Structure Contractors	435	41
238990	Site Preparation Contractors	204	58
488100	All Specialty Trade Contractors	82	2
423610	Support Activities for Air Transportation	120	4
	Electrical Apparatus & Equipment, Wiring Supplies & Related Equipment Merchant		
9	NAICS Classification	2098	158

**Construction Sub-total**

541330	Engineering Services	352	7
541370	Surveying & Mapping Services	103	2
541380	Test Laboratories	47	3

**Professional Services Sub-total**

**ARFF Station Rehabilitation - Phase 2**

\$2,400,000.00

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		All Firms	DBE Firms
238290	Building Equipment Contractors	80	2
444190	Other Building Material Dealers	434	2
236220	Commercial & Institutional Building Construction	405	7
532412	Construction Equipment Rental & Leasing	70	1
423390	Construction Material Merchant Wholesalers	46	12
238310	Drywall & Insulation Contractors	159	1
423610	Electrical Apparatus & Equipment, Wiring Supplies & Related Equipment Merchant	120	4
238210	Electrical Contractors	716	4
332999	Fabricated Metal Product Manufacturing	20	1
238350	Finish Carpentry Contractors	199	2
484110	General Freight Trucking, Local	278	29
236210	Industrial Building Construction	49	1
423310	Lumber, Plywood, Millwork, and Wood Panel Merchant Wholesalers	74	1
238320	Paint & Wall Covering Contractors	210	4
238220	Plumbing, Heating, & A/C Contractors	996	4
238110	Poured Concrete Foundation & Structure Contractors	215	41

562910	Remediation Services	11	2
238160	Roofing Contractors	113	2
423330	Roofing Materials (Except Wood)	27	1
238170	Siding Contractors	86	1
238990	All other specialty trades contractors	204	58
21	NAICS Classifications	4512	180

**Construction Sub-total**

541310	Architectural Services	160	5
541330	Engineering services	352	7

**Professional Services Sub-total**

2	NAICS Classifications	512	12
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**West Airfield Drainage –Phase 2  
\$1,500,000.00**

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532412	Construction Equipment Rental & Leasing	70	1	DBE Firms
237990	Heavy & Civil Engineering Construction	46	3	
238110	Poured Concrete Foundation & Structure Contractors	215	41	
238910	Site Preparation Contractors	435	41	
488100	Support Activities for Air Transportation	82	2	
237110	Water & Sewer Line & Related Structures Construction	183	4	
6	NAICS Classifications	1031	92	

**Construction Sub-total**

541330	Engineering services	352	7
541370	Surveying & Mapping Services	103	2
541380	Testing Laboratories	47	3

**Professional Services Sub-total**

3	NAICS Classifications	502	12
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**PAPI Installation Runway 36, 4L  
22R & 4R  
\$780,000.00**

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532412	Construction Equipment Rental & Leasing	70	1	DBE Firms
423610	Electrical Apparatus & Equipment, Wiring Supplies & Related Equipment Merchant	120	4	
238210	Electrical Contractors	716	4	
238110	Poured Concrete Foundation & Structure Contractors	215	41	
238910	Site Preparation Contractors	435	41	
488100	Support Activities for Air Transportation	82	2	
238990	All other specialty trade contractors	204	58	
7	NAICS Classifications	1842	151	

**Construction Sub-total**

541330	Engineering services	7
541370	Surveying & Mapping Services	2
541380	Testing Laboratories	3
<hr/>		352
3	NAICS Classifications	12
<hr/>		502

Professional Services  
Sub-total

**Runway 22L Fencing &  
Embankment Stabilization –  
Phase 2  
\$850,000.00**

532412	Construction Equipment Rental & Leasing	1
561730	Landscaping Services	4
238110	Poured Concrete Foundation & Structure Contractors	41
238910	Site Preparation Contractors	41
<hr/>		87
4	NAICS Classifications	87
<hr/>		1239

Construction Sub-total

541370	Surveying & Mapping Services	2
541330	Engineering services	7
<hr/>		352

Professional Services  
Sub-total

455

9

**Rehabilitate TW Alpha, Kilo, Phase  
1 Design  
\$240,000.00**

541380	Testing Laboratories	3
541370	Surveying & Mapping Services	2
541330	Engineering Services	7
<hr/>		352
3	NAICS Classifications	12
<hr/>		502

Professional Services  
Sub-total

**Terminal Redevelopment – Phase 1  
\$20,000,000.00**

423320	Brick, Stone, & Related Construction Material Merchant Wholesalers	2
238320	Bridge Painting, Shop, Field & Maintenance Painting of Structural Steel	4
238290	Building Equipment Contractors	2
<hr/>		80
<hr/>		43

All Firms

DBE Firms

444190	Other Building Material Dealers	434	2
236220	Commercial & Institutional Building Construction	436	7
532412	Construction Equipment Rental & Leasing	70	1
423390	Construction Material Merchant Wholesalers	46	12
238310	Drywall & Insulation Contractors	159	1
423610	Electrical Apparatus & Equipment, Wiring Supplies & Related Merchant Wholesalers	120	4
238210	Electrical Contractors	716	4
332999	Fabricated Metal Product Manufacturing	20	1
238350	Finish Carpentry Contractors	199	2
484110	General Freight Trucking, Local	278	29
237990	Heavy Civil & Engineering Construction	46	3
237310	Highway, Street, Bridge Construction	159	38
561730	Landscaping Services	519	4
423310	Lumber, Plywood, Millwork, and Wood Panel Merchant Wholesalers	74	1
561790	Other Services to Building and Dwellings	52	1
238220	Paint & Wall Covering Contractors	982	4
238220	Plumbing, Heating, & A/C Contractors	996	4
238110	Poured Concrete Foundation & Structure Contractors	215	41
423490	Other Professional Equipment & Supplies Merchant Wholesalers	12	1
926120	Regulation & Administration of Transportation Programs	75	1
423330	Transportation Programs	27	1
238160	Roofing Material (Except Wood) Roofing Contractors	113	2
238170	Siding Contractors	86	1
238910	Site Preparation Contractors	435	41
238120	Structural Steel & Precast Concrete Contractors	23	14
488100	Support Activities for Air Transportation	82	2
488999	Support Activities for Transportation	2	2
237110	Water & Sewer Line & Related Structures Construction	171	4
238990	All other specialty trade contractors	204	58
32	NAICS Classifications	7084	294
	<b>Construction Sub-total</b>		

541310	Architectural Services	160	5
541320	Landscaping Architectural Services	23	4
541990	Professional, Scientific & Technical Services	72	2
541371	Surveying & Mapping Services	103	2
541330	Engineering services	352	7
541380	Testing Laboratories	47	3
<b>Professional Services</b>		<b>757</b>	<b>23</b>
<b>Sub-total</b>			

**Professional Services**  
**Sub-total**

6 NAICS Classifications

**Airfield Maintenance Facility –**

**Phase 2**  
**\$8,213,692.00**

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238210	Electrical Contractors	All Firms	DBE Firms
	Bridge Painting, Shop, Field & Maintenance Painting of Structural Steel	716	4
238320	Building Equipment Contractors	210	4
238290	Other Building Material Dealers	80	2
444190	Commercial & Institutional Building Construction	434	2
236220	Construction Equipment Rental & Leasing	436	7
532412	Construction Material Merchant Wholesalers	70	1
423390	Drywall & Insulation Contractors	46	12
238310	Electrical Apparatus & Equipment, Wiring Supplies & Related Merchant Wholesalers	159	1
423610	Fabricated Metal Product Manufacturing	120	4
332999	Finish Carpentry Contractors	20	1
238350	General Freight Trucking, Local	199	2
484110	Heavy Civil & Engineering Construction	278	29
237990	Highway, Street, Bridge Construction	46	3
237310	Industrial Building Construction	159	38
236210	Industrial Supplies Merchant Wholesalers	278	29
423840	Landscaping Services	80	2
561730	Lumber, Plywood, Millwork, and Wood Panel Merchant Wholesalers	519	4
423310	Other Services to Building and Dwellings	74	1
561790	Paint & Wall Covering Contractors	52	1
238220	Plumbing, Heating, & A/C Contractors	982	4
238220	Poured Concrete Foundation &	996	4
238110		215	41

Structure Contractors		
Other Professional Equipment & Supplies Merchant Wholesalers	12	1
Roofing Contractors	113	2
Roofing Material (Except Wood)	27	1
Siding Contractors	86	1
Site Preparation Contractors	435	41
Structural Steel & Precast Concrete Contractors	23	14
Water & Sewer Line & Related Structures Construction	171	4
All other specialty trade contractors	204	58
30 NAICS Classification	7240	318
<b>Construction Sub-total</b>		
Architectural Services	160	5
Landscaping Architectural Services	23	4
Professional, Scientific & Technical Services	72	2
Surveying & Mapping Services	103	2
Testing Laboratories	47	3
Engineering Services	352	7
6 NAICS Classification	757	23
<b>Professional Services Sub-total</b>		

**In-line BHS/EDS Equipment – Phase 2**  
**\$12,020,000.00**

238290 Building Equipment Contractors			
444190 Other Building Material Dealers			
236220 Commercial & Institutional Building Construction			
532412 Construction Equipment Rental & Leasing			
423390 Construction Material Merchant Wholesalers			
238310 Drywall & Insulation Contractors			
423610 Electrical Apparatus & Equipment, Wiring Supplies & Related Merchant Wholesalers			
238210 Electrical Contractors			
238350 Finish Carpentry Contractors			
484110 General Freight Trucking, Local			
236210 Industrial Building Construction			
423840 Industrial Supplies Merchant Wholesalers			
561790 Other Services to Building and Dwellings			
All Firms	80	2	DBE Firms
	434	2	
	436	7	
	70	1	
	46	12	
	159	1	
	120	4	
	716	4	
	199	2	
	278	29	
	278	29	
	80	2	
	52	1	

238220	Paint & Wall Covering Contractors	982	4
238220	Plumbing, Heating, & A/C Contractors	996	4
238110	Poured Concrete Foundation & Structure Contractors	215	41
423490	Other Professional Equipment & Supplies Merchant Wholesalers	12	1
238990	All other specialty trades contractors	204	58
18	NAICS Classifications	5357	204
<b>Construction Sub-total</b>			
541310	Architectural Services	160	5
541990	Professional, Scientific & Technical Services	72	2
541330	Engineering services	352	7
3	NAICS Classifications	584	14
<b>Professional Services Sub-total</b>			

**Available Contractors**

Step One: Relative Availability

35476

1613

Total DBEs (Numerator) 1613  
 Total firms (Denominator) 35476  
 0.0454

**Base Figure**

## Step Two: Adjustments

Several potential factors were evaluated for possible adjustments to the Base Figure from external sources. Only the accomplishments from the past three years were considered. The other considerations are listed below:

- The absence of a recent disparity study (last performed in July 1996).
- Additionally, the Arkansas Mississippi Minority Business Council (AMMBC) aids DBE firms in becoming certified by explaining the process and if needed assisting them with the DBE application process, etc. AMMBC also certifies small, minority and women businesses in the service sector as Minority Business Enterprises (MBEs) and assists them in obtaining contracts with the public and private businesses and large corporate agencies. Plans are to integrate these DBE and MBE businesses into a list that the Airport will use to increase its pool of minority contractors and its DBEs in the future.
- The March 2007 list of Minority Owned Banks, issued by the Federal Reserve Board, confirms that there are no minority owned banks or financial institutions within the state.
- The Commission does not administer a state or local program, but has created a local minority business program for use by the Airport for AIP and non-AIP funded projects as well as purchases of goods and services. This program began in 2008.
- The Commission is not aware of any discrimination violations within financial institutions within the community or any other types of organizations.

<b>Step Two: Adjustments</b>						
						<b>Annual Accomplishments</b>
<b>LRNA 2007 Accomplishments</b>						0.1320
<b>LRNA 2008 Accomplishments</b>						0.1560
<b>LRNA 2009 Accomplishments</b>						0.1210
<b>Part A:</b>			<b>Part B:</b>			
<b>LRNA Median</b>		<b>0.1320</b>		<b>Step One Base Figure</b>		<b>0.0454</b>
				<b>Step Two Median</b>		<b>0.1320</b>
				<b>0.177</b>	<b>/2</b>	<b>=</b>
				<b>Average</b>		<b>0.088</b>
			<b>2011 Overall Adjusted Goal (rounded)</b>			<b>9%</b>

## **Race Neutral Considerations**

The Commission will meet the maximum feasible portion of its overall goal by using race-neutral means of facilitating DBE participation via such means as pre-bid meetings, contract sizing, encouraging primes to subcontract work, making referrals to development programs and review of bonding requirements, etc.

The Commission has created a Minority Business Committee to examine the DBE Program's effectiveness, to identify possible improvements to its operation and administration and to expand to include and invite non-certified businesses as well. The Committee is comprised of two (2) Commission members and Airport staff. The Committee is committed to continuing its efforts to ensure that the DBE Program is administered according to guidelines and to commit adequate staffing to execute responsibilities.

As in previous years, the Commission will continue its efforts in the following areas:

- Seminars/conferences are held in the Little Rock area by various local, state and federal organizations. Commission staff will continue to attend, participate, exhibit and network with minority-owned small businesses.
- The Commission staff continues to be in contact with the AMAC offices and with other Airports around the country to exchange data on upcoming training sessions, work projects, etc. that have an effect on increasing DBE participation.
- A Business Card Exchange meeting will be held in Spring 2011 with minority contractors and Airport staff to discuss airport and federal contracting policies, the bidding process and opportunities available to companies interested in doing business with the Airport, from paper products and cleaning supplies to construction and security projects.
- Staff attended the FAA Partnership Conference in St. Louis, MO in May 2010 and will attend future FAA DBE Program workshops to keep current on the program guidelines.

The chart below compares DBE participation with the established goal for the past three years. The basis of the estimated breakout of race neutral and race conscious DBE participation is the following:

## Race Neutral Considerations

	2007	2008	2009
<b>Accomplishments</b>	13.2%	15.6%	12.1%
<b>FY Annual Goals</b>	15%	11%	10%
<b>Difference</b>	-1.80%	4.6%	2.1%

Median:	Ascending Order of Variance: goals - accomplishments		
	-1.80%	2.1%	4.6%

<b>2011 Overall adjusted goal</b> (rounded figures)	<u><b>9%</b></u>
<b><i>Race conscious goal</i></b>	<b>9.0%</b>
<b><i>Race neutral goal</i></b>	<b>0.0%</b>

The 2007 accomplishment of 13.2% was almost 2 percent below the goal of 15%. The 2008 goal of 11% was exceeded by 4.6%, and the goal of 2009 of 10% was exceeded by 2.1%. No prime contracts have been awarded to DBEs since 2005 and this, along with identifying and using more DBE firms, appear to be the keys to accomplishing the Commission goals each year.

Given the type of work proposed for FY 2011, the Commission believes that our overall goal of 9% will be achieved 9% through race conscious measures and 0% through race neutral means. The Commission will monitor the projects and make any necessary adjustments as needed.

The Commission will adjust the estimated breakout of race neutral and race conscious DBE participation as needed to reflect actual DBE participation (see Section 26.51(f)) and track and report race neutral and race conscious participation separately. For reporting purposes, race neutral DBE participation includes, but is not necessarily limited to, the following: DBE participation through a prime contract obtained 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.

## **Process**

Public participation is being sought through several means to obtain public comment concerning the availability of disadvantaged and non-disadvantaged businesses, the effects of discrimination on opportunities for DBEs and the Commission's efforts to establish a level playing field. A Minority Business Open House will be held in Spring 2011. The purpose of this meeting will be to answer questions and obtain feedback from the community concerning Airport contracting possibilities and make them aware of the upcoming contracts for 2012. The Commission has increased its networking efforts with the Little Rock Regional Chamber of Commerce staff responsible for minority and women's business opportunities. The Commission is publishing the proposed goals on its newly reinvented website, [www.fly-lit.com](http://www.fly-lit.com), in the statewide daily newspaper, *Arkansas Democrat Gazette*, as well as a business newspaper whose emphasis is on the Hispanic community, the *El Latino* and in the newspaper whose emphasis is on the Black community, *The Stand*. It will also be posted at the Commission's offices in the Little Rock National Airport for 30 days. Furthermore, it is being mailed to the following advocacy groups/agencies that have outreach programs or provide assistance to DBE firms:

Arkansas Mississippi Minority Business Council  
Arkansas Minority and Women Business Roundtable  
NAACP-Little Rock  
Small Business Administration  
University of Arkansas-Procurement Assistance Center  
Arkansas Department of Economic Development  
Little Rock Regional Chamber of Commerce  
Pulaski Technical College

The notice of publication will seek comments for 45 days after the initial date of publication, September 13, 2010. See Exhibit 1: Notice of Publication. The Commission, along with the FAA, Southwest Regional Office located in Fort Worth, TX 76193 is available to receive comments from the public. Evidence of the publication is reflected in Exhibit 2: Publication Affidavits. (to be forwarded)

Additionally, the goal methodology will be available for review at the Commission's office (One Airport Drive) during normal business hours (8:00 A.M. to 5:00 P.M.). The Director-Properties, Planning, and Development will be available to discuss and review the methodology with concerned citizens.

The final DBE goal shall become effective October 1 of the fiscal year, unless DOT instructs otherwise. The Commission's proposed goals are to be submitted to DOT by August 1.

## **Contract Goals**

The Commission will use contract goals (race-conscious means) to meet any portion of the overall goal the Commission does not project being able to meet using race-neutral means. Contract goals are established so that, over the period to which the overall goal applied, they will cumulatively result in meeting any portion of the overall goal that is not projected to be met through the use of race-neutral means.

The Commission will establish contract goals only on those DOT-assisted contracts that have subcontracting possibilities. The Commission will not establish a contract goal on every such contract, and the size of contract goals will be adapted to the circumstances of each such contract (e.g., type and location of work, availability of DBEs to perform the particular type of work).

The Commission will express contract goals as a percentage of the federal share of the DOT-assisted contract.

## **Exhibit 1: Notice of Publication**

The Little Rock Municipal Airport Commission's Disadvantaged Business Enterprise Program has established a DBE goal of 9% in accordance with the Code of Federal Regulation 49, Part 26 for the US Department of Transportation for fiscal year 2011. The Little Rock Municipal Airport Commission (Commission) in compliance with its policies and the Code of Federal Regulations shall not discriminate on the basis of race, color, national origin or sex in the award and performance of any DOT assisted contract or in the administration of its DBE Program. Public participation is encouraged. Documents are available for review during the Commission's normal business hours in the Properties Department. Comments regarding the goal may be directed to Thomas W. Clarke, Director-Properties, Planning, and Development, Little Rock Municipal Airport Commission, One Airport Drive, Little Rock, AR 72202 or to Christine M. Whitehead, External Program Manager, FAA, 1601 Lind Avenue SW-ANM-9, Renton, WA 98057 for 45 days from the date of this notice, September 13, 2010. Written comments are encouraged. The normal business hours for the Commission are during the hours of 8:00 A.M. to 5:00 P.M., from Monday through Friday, excluding approved holidays. All comments shall be reviewed and considered as a part of the goal methodology.

## **Exhibit 2: Publication Affidavits**

The Disadvantaged Business Enterprise Goal for FY 2011 was printed in the publications listed below. Copies of the advertisements are found on the pages immediately following this exhibit.

Publications used to print the DBE Goal:

- *Arkansas Democrat – Gazette*
- *Construction News*
- *El Latino*
- *The Stand*

## **Exhibit 3: Public Comments and Commission Responses**

The Commission will document and respond to all comments. Consideration to concerns will be considered and adjustments made to the original FY 2011 DBE Goal submittal, if warranted, by an amendment to the FAA.