

**DBE GOAL METHODOLOGY**  
**49 CFR PART 26**  
**CULLMAN REGIONAL AIRPORT**  
**CULLMAN, ALABAMA**  
**FY 2021-2023**  
**FISCAL YEAR 2021**

A. GOALS - To make the program as useful as possible to the public, the City of Cullman and Cullman County, (Sponsor) Cullman, Alabama will update the "amount," "method," and "breakout" portions of this section of the program annually, or as required. The following sections will be submitted to the FAA every year for approval, or as required: Amount of Overall goal section, Method used for establishing overall goals, Process, the Race-Neutral/Race Conscious breakout, and contract goals. The material on overall goals in the DBE program will be a shorter summary of the material submitted annually, or as required, in the overall goal submission.

B. AMOUNT OF GOAL -The City of Cullman and Cullman County's overall goal for FY 2021 is 9.30% of the Federal financial assistance we will expend in FAA-assisted contracts. The Sponsor expects to let during FY 2021, \$4,168,160.00 in construction and engineering contracts which means that we have set a goal of expending \$387,639.00 with DBEs for this Fiscal Year. This overall goal is intended for information of public users of the program, and does not imply that the FAA, as such, has approved the goal.

C. METHOD STEP 1: In the development of the DBE goal for Cullman Regional Airport the first step was to establish the availability of ready, willing and able DBE businesses that were capable of participating in the type of contracts that were programmed during FY 2021. The project that is anticipated at Cullman Regional Airport includes the Runway Rehabilitation, along with the professional efforts associated with the project. The monetary size of the project is expected to be \$4,168,160.00. An analysis of the project indicates that funds will be expended in the following areas:

<b>CULLMAN REGIONAL AIRPORT PROJECT ANALYSIS FY 2021</b>			
TASK	NAICS	AMOUNT	PERCENTAGE
General Contractors	236220	\$112,500	2.70%
Street/Highway	237310	\$2,360,790	56.64%
Electrical	238210	\$71,000	1.71%
Site Prep	238910	\$596,880	14.32%
Hauling	484110	\$369,000	8.85%
Engineering	541330	\$450,000	10.79%
Landscaping	561730	\$207,990	4.99%
TOTAL		\$4,168,160.00	100.00%

The weighting factor is the value of each work item based on cost as a fraction of the whole project.

The formula to be used to calculate the Base Figure for the DBE goal is as follows:

$$\frac{\text{Total DBE Firms in the State by County/NAICS Code of Work to be Performed}}{\text{Total Firms in the State by County/NAICS Code of Work to be Performed}} \times 100 = \text{Base Figure}$$

A search was initiated for a Directory that would identify firms to accomplish these tasks. It was generally agreed that the most comprehensive directory for DBE firms in Alabama was the DBE Directory that has been established by the Alabama Department of Transportation. This directory contains DBE firms that have been certified in accordance with the requirements for 49 CFR Part 26. The DBE Directory dated September, 2020 was utilized for this project. Past projects experience indicated that bidders came from the counties of Cullman, Marshall, Morgan and Madison counties in Alabama. It was considered reasonable to establish the aforementioned counties as the market area for the FY 2021-FY 2023 projects. The list was further refined by identifying those firms that could participate in the project by their appropriate NAICSs. The resulting number will be used as the numerator in determining the Base Figure.

The next step in establishing the Base Figure was to determine our denominator. This was accomplished through the use of the Census Bureau’s County Business Pattern (CBCBP) and the identification of the NAICSs that were the same as those identified from the Directory. With these figures in hand we compute our Base Figure using the following mathematics:

$$\frac{\text{Base Figure}}{\text{Base Figure}} = .0270 \left( \frac{\text{ANAICS236220}}{\text{NAICS236220}} \right) + .5664 \left( \frac{\text{ANAICS237310}}{\text{NAICS237310}} \right) + .0171 \left( \frac{\text{ANAICS238210}}{\text{NAICS238210}} \right) + .1432 \left( \frac{\text{ANAICS238910}}{\text{NAICS238910}} \right) + .0885 \left( \frac{\text{ANAICS484220}}{\text{NAICS484220}} \right) + .1079 \left( \frac{\text{ANAICS541330}}{\text{NAICS541330}} \right) + .0499 \left( \frac{\text{ANAICS561730}}{\text{NAICS561730}} \right)$$

ANAICS- Alabama DBE Directory NAICS  
 NAICS – Census Bureau’s County Business Pattern (CBCBP) Data Base

$$\frac{\text{Base Figure}}{\text{Base Figure}} = .0270 \left( \frac{4}{87} \right) + .5664 \left( \frac{2}{20} \right) + .0171 \left( \frac{4}{168} \right) + .1432 \left( \frac{4}{55} \right) + .0885 \left( \frac{4}{61} \right) + .1079 \left( \frac{6}{331} \right) + .0499 \left( \frac{5}{169} \right)$$

$$\frac{\text{Base Figure}}{\text{Base Figure}} = .0012 + .0566 + .0004 + .0104 + .0058 + .0020 + .0015$$

$$\frac{\text{Base Figure}}{\text{Base Figure}} = 7.79\%$$

STEP 2: With the Base Figure established our next step was to more finely tailor this figure to reflect conditions which have occurred at Cullman Regional Airport. Currently there are no known disparity studies completed in this area of the State of Alabama. The City of Cullman and Cullman County, has considered the suggested options outlined in 49 CFR Part 26 and determined past performance is the information available to determine if an adjustment to our Base Figure is warranted. It was felt that a sampling of like type projects that have taken place in Alabama would be appropriate for use in determining if an adjustment was required to the Base Figure. To this end, we investigated three airports with like type projects. Each of these airports has received an FAA grant for projects of a similar magnitude and type anticipated at Cullman Regional Airport. Listed below are the projects that were included for analysis. As you will note, each of these projects is of a similar nature as the project that is being anticipated in the 2021 time frame at Cullman Regional Airport.

<b>PREVIOUS FAA PROJECTS</b>			
<b>YEAR</b>	<b>LOCATION</b>	<b>PROJECT TYPE</b>	<b>% OF DBE PARTICIPATION</b>
2018	Camden	Runway Rehabilitation	10.28%
2016	Dauphin Island	Runway Rehabilitation	24.30%
2016	Evergreen	Taxiway Extension	10.80%*
*Median			

The next step was to determine if any adjustment might be needed to the Base Figure. It was determined that the Median of the three projects was 10.80% and it was felt that the Base Figure should be adjusted to cater for this variance.

A summary of this analysis yields the following:

MEDIAN PERCENTAGE	10.80%
BASE FIGURE	<u>+ 7.79%</u>
	18.59% ÷ 2 = 9.30%

Satisfied that the Median Percentage was valid, the final step in the comparison was the development of a simple average of the Base Figure and the Median Percentage to establish a final percentage. The result of this was 9.30%. It was felt that the Base Figure of 7.79% should be adjusted for this variance. The Average Percentage of 9.30% is established as the goal for DBE participation at Cullman Regional Airport for FY 2021.

D. PROCESS - The City of Cullman and Cullman County, Cullman, Alabama submits its overall goal for FY 2021 to the FAA in September, 2020, for their consideration and approval. Before establishing the overall goal each year, the Sponsor has personally consulted with stakeholders to obtain information concerning the availability of disadvantaged and non-disadvantaged businesses, and the effects of discrimination on opportunities for DBEs. The Sponsor's efforts are to establish a level playing field for the participation of DBEs. Following this consultation, The Sponsor has published a notice of the proposed overall goal, informing the public that the proposed goal and its rationale are available for inspection during normal business hours at the Sponsor's principal office for 30 days following the date of the notice, and informing the public

that the Sponsor and FAA will accept comments on the goal for 30 days from the date of the notice. This information was published on the Cullman Regional Airport website, and FAA website, and made available to the Office of Minority Business Development at the State of Alabama. Normally, the Sponsor will issue this notice by June 1 of each year. The notice will include the Sponsor’s address to which comments may be sent. The overall goal submission to the FAA will include a summary of information and comments received during this public participation process and the Sponsor’s responses. We will begin using our overall goal on October 1 of each year, unless we have received other instructions from DOT (or if the goal is established on a project basis, by the time of the first solicitation for a DOT-assisted contract for the project). Consultation discussions were held with the following stakeholders September 23, 2020, 11:00 am CDT with no comments received.

<b>CULLMAN REGIONAL AIRPORT AGENCIES/PERSONS CONSULTED WITH</b>	
Agency/Organization	Discussion/Information
Cullman Regional Airport Mr. Ben Harrison, Airport Manager	Availabilities of DBEs, Directories, small and DBE contracting experience in the local market
GMC Ms. Natalie Hobbs, PE	Availabilities of DBEs, Directories, small and DBE contracting experience in the local market
Taffy Pippin Consulting, LLC Ms. Taffy Pippin, Consultant	Availabilities of DBEs, Directories, small and DBE contracting experience in the local market
Taffy Pippin Consulting, LLC Mr. Clayton Pippin, Planner	Availabilities of DBEs, Directories, small and DBE contracting experience in the local market

Public comments have been requested for the FY 2021 goal and the 30 day comment period is underway. Any comments received from the public advertisement or the other coordination will be evaluated and necessary changes will be made to the goal and included in the contract documents for the project.

**E. RACE CONSCIOUS AND RACE NEUTRAL GOALS:** The Sponsor will meet the maximum feasible portion of its overall goal by using race-neutral means of facilitating DBE participation. Each time The City of Cullman and Cullman County, submits an overall goal for review by the FAA, the Sponsor will also submit a projection of the portion of the goal that is expected to be met through race-neutral means and the basis for that projection. This projection is subject to approval by the FAA, in conjunction with its review of the Sponsor’s overall goal. The Sponsor has established contract goals to meet any portion of an overall goal when the Sponsor does not project being able to meet goals using race-neutral means.

We estimate that, in meeting our overall goal of 9.30%, that 7.21% of the goal will be attained from race-conscious participation and 2.09% via race-neutral participation measures. This is an attainable goal based on the history of DBE participation in prior projects and the availability of current DBE contractors.

This breakout was established by computing the median of the variance of the level of DBE participation vs. DBE goal on the three projects considered in Step 2 (see page 3) of the overall goal participation computation. The Median Percentage was 2.09% and we felt it is an attainable goal for race-neutral participation. The following is the level of variance in each of the projects:

<b>PROJECT DBE GOAL VARIANCE CULLMAN REGIONAL AIRPORT PREVIOUS FAA PROJECTS</b>				
<b>YEAR</b>	<b>LOCATION</b>	<b>DBE GOAL</b>	<b>% OF DBE PARTICIPATION</b>	<b>VARIANCE</b>
2018	Camden	8.19%	10.28%	2.09%*
2016	Dauphin Island	10.21%	24.30%	14.09%
2016	Evergreen	10.15%	10.80%	0.65%
* MEDIAN VARIANCE				

F. CONTRACT GOALS: The City of Cullman and Cullman County, will use contract goals to meet any portion of the overall goal that the Sponsor 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 applies, 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.

**FISCAL YEAR 2022**

A. Goals - To make the program as useful as possible to the public, The City of Cullman and Cullman County, Cullman, Alabama will update the "amount," "method," and "breakout" portions of this section of the program annually, or as required. The following sections will be submitted to the FAA every year for approval, or as required: Amount of Overall goal section, Method used for establishing overall goals, Process, the Race-Neutral/Race Conscious breakout, and contract goals. The material on overall goals in the DBE program will be a shorter summary of the material submitted annually, or as required, in the overall goal submission.

B. Amount of Goal -The City of Cullman and Cullman County's overall goal for FY 2022 is 10.36% of the Federal financial assistance we will expend in FAA-assisted contracts. The Sponsor expects to let during FY 2022, \$3,258,495.00 in construction and engineering contracts which means that we have set a goal of expending \$337,580.00 with DBEs for this Fiscal Year. This overall goal is intended for information of public users of the program, and does not imply that the FAA, as such, has approved the goal.

C. METHOD STEP 1: In the development of the DBE goal for Cullman Regional Airport the first step was to establish the availability of ready, willing and able DBE businesses that were capable of participating in the type of contracts that were programmed during FY 2022. The project that is anticipated at Cullman Regional Airport includes the Rehabilitation of Apron. The monetary size of the project is expected to be \$3,258,495.00. An analysis of the project indicates that funds will be expended in the following areas:

<b>CULLMAN REGIONAL AIRPORT PROJECT ANALYSIS FY 2022</b>			
<b>TASK</b>	<b>NAICS</b>	<b>AMOUNT</b>	<b>PERCENTAGE</b>
General Contractors	236220	\$302,400	9.28%
Street/Highway	237310	\$1,426,050	43.76%

Site Prep	238910	\$594,000	18.23%
Hauling	484220	\$261,000	8.01%
Engineering	541330	\$643,050	19.74%
Consulting	541611	\$9,450	0.29%
Landscaping	561730	\$22,545	0.69%
TOTAL		\$3,258,495.00	100.00%

The weighting factor is the value of each work item based on cost as a fraction of the whole project.

The formula to be used to calculate the Base Figure for the DBE goal is as follows:

$$\frac{\text{Total DBE Firms in the State by Counties/NAICS Code of Work to be Performed}}{\text{Total Firms in the State by Counties/NAICS Code of Work to be Performed}} \times 100 = \text{Base Figure}$$

A search was initiated for a Directory that would identify firms to accomplish these tasks. It was generally agreed that the most comprehensive directory for DBE firms in Alabama was the DBE Directory that has been established by the Alabama Department of Transportation. This directory contains DBE firms that have been certified in accordance with the requirements for 49 CFR Part 26. The DBE Directory dated September, 2020 was utilized for this project. Past projects experience indicated that bidders came from the counties of Cullman, Marshall, Morgan and Madison counties in Alabama. It was considered reasonable to establish the aforementioned counties as the market area for the FY 2021-FY 2023 projects. The list was further refined by identifying those firms that could participate in the project by their appropriate NAICSs. The resulting number will be used as the numerator in determining the Base Figure.

The next step in establishing the Base Figure was to determine our denominator. This was accomplished through the use of the Census Bureau’s County Business Pattern (CBCBP) and the identification of the NAICSs that were the same as those identified from the Directory. With these figures in hand we compute our Base Figure using the following mathematics:

$$\frac{\text{Base Figure}}{\text{Base Figure}} = .0928 \left( \frac{\text{ANAICS236220}}{\text{NAICS236220}} \right) + .4376 \left( \frac{\text{ANAICS237310}}{\text{NAICS237310}} \right) + .1823 \left( \frac{\text{ANAICS238910}}{\text{NAICS238910}} \right) + .0801 \left( \frac{\text{ANAICS484220}}{\text{NAICS484220}} \right) + .1974 \left( \frac{\text{ANAICS541330}}{\text{NAICS541330}} \right) + .0029 \left( \frac{\text{ANAICS541611}}{\text{NAICS541611}} \right) + .0069 \left( \frac{\text{ANAICS561730}}{\text{NAICS561730}} \right)$$

ANAICS- Alabama DBE Directory NAICS  
 NAICS – Census Bureau’s County Business Pattern (CBCBP) Data Base

$$\frac{Base}{Figure} = .0928\left(\frac{4}{87}\right) + .4376\left(\frac{2}{20}\right) + .1823\left(\frac{4}{55}\right) + .0801\left(\frac{4}{61}\right) + .1974\left(\frac{6}{331}\right) + .0029\left(\frac{9}{134}\right) + .0069\left(\frac{5}{169}\right)$$

$$\frac{Base}{Figure} = .0043 + .0438 + .0133 + .0053 + .0036 + .0002 + .0002$$

$$\frac{Base}{Figure} = 7.07\%$$

STEP 2: With the Base Figure established our next step was to more finely tailor this figure to reflect conditions which have occurred at Cullman Regional Airport. Currently there are no known disparity studies completed in this area of the State of Alabama. The City of Cullman and Cullman County, has considered the suggested options outlined in 49 CFR Part 26 and determined past performance is the information available to determine if an adjustment to our Base Figure is warranted. It was felt that a sampling of like type projects that have taken place in Alabama would be appropriate for use in determining if an adjustment was required to the Base Figure. To this end, we investigated three airports with like type projects. Each of these airports has received an FAA grant for projects of a similar magnitude and type anticipated at Cullman Regional Airport. Listed below are the projects that were included for analysis. As you will note, each of these projects is of a similar nature as the project that is being anticipated in the 2022 time frame at Cullman Regional Airport.

<b>PREVIOUS FAA PROJECTS</b>			
<b>YEAR</b>	<b>LOCATION</b>	<b>PROJECT TYPE</b>	<b>% OF DBE PARTICIPATION</b>
2016	Fairhope	Construct Apron	13.64% *
2012	Headland	Apron Expansion	9.58%
2012	Cullman	Apron Rehabilitation	19.38%
*Median			

The next step was to determine if any adjustment might be needed to the Base Figure. It was determined that the Median of the three projects was 13.64% and it was felt that the Base Figure should be adjusted to cater for this variance.

A summary of this analysis yields the following:

MEDIAN PERCENTAGE	13.64%
BASE FIGURE	+ <u>7.07%</u>

$$20.71\% \div 2 = 10.36\%$$

Satisfied that the Median Percentage was valid, the final step in the comparison was the development of a simple average of the Base Figure and the Median Percentage to establish a final percentage. The result of this was 10.36%. It was felt that the Base Figure of 7.07% should be adjusted for this variance. The Average Percentage of 10.36% is established as the goal for DBE participation at Cullman Regional Airport for FY 2022.

D. PROCESS - The City of Cullman and Cullman County, Cullman, Alabama submits its overall goal for FY 2022 to the FAA in September, 2020, for their consideration and approval. Before establishing the overall goal each year, the Sponsor has personally consulted with stakeholders to obtain information concerning the availability of disadvantaged and non-disadvantaged businesses, and the effects of discrimination on opportunities for DBEs. The Sponsor’s efforts are to establish a level playing field for the participation of DBEs. Following this consultation, The Sponsor has published a notice of the proposed overall goal, informing the public that the proposed goal and its rationale are available for inspection during normal business hours at the Sponsor’s principal office for 30 days following the date of the notice, and informing the public that the Sponsor and FAA will accept comments on the goal for 30 days from the date of the notice. This information was published on the Cullman Regional Airport website, and FAA website, and made available to the Office of Minority Business Development at the State of Alabama. Normally, the Sponsor will issue this notice by June 1 of each year. The notice will include the Sponsor’s address to which comments may be sent. The overall goal submission to the FAA will include a summary of information and comments received during this public participation process and the Sponsor’s responses. We will begin using our overall goal on October 1 of each year, unless we have received other instructions from DOT (or if the goal is established on a project basis, by the time of the first solicitation for a DOT-assisted contract for the project). Consultation discussions were held with the following stakeholders September 23, 2020, 11:00 am CDT with no comments received.

<b>CULLMAN REGIONAL AIRPORT AGENCIES/PERSONS CONSULTED WITH</b>	
Agency/Organization	Discussion/Information
Cullman Regional Airport Mr. Ben Harrison, Airport Manager	Availabilities of DBEs, Directories, small and DBE contracting experience in the local market
GMC Ms. Natalie Hobbs, PE	Availabilities of DBEs, Directories, small and DBE contracting experience in the local market
Taffy Pippin Consulting, LLC Ms. Taffy Pippin, Consultant	Availabilities of DBEs, Directories, small and DBE contracting experience in the local market
Taffy Pippin Consulting, LLC Mr. Clayton Pippin, Planner	Availabilities of DBEs, Directories, small and DBE contracting experience in the local market

Public comments have been requested for the FY 2022 goal and the 30 day comment period is underway. Any comments received from the public advertisement or the other coordination will be evaluated and necessary changes will be made to the goal and included in the contract documents for the project.

E. RACE CONSCIOUS AND RACE NEUTRAL GOALS: The Sponsor will meet the maximum feasible portion of its overall goal by using race-neutral means of facilitating DBE participation. Each time The City of Cullman and Cullman County, submits an overall goal for review by the FAA, the Sponsor will also submit a projection of the portion of the goal that is expected to be met through race-neutral means and the basis for that projection. This projection is subject to approval by the FAA, in conjunction with its review of the Sponsor’s overall goal. The Sponsor has established contract goals to meet any portion of an overall goal when the Sponsor does not project being able to meet goals using race-neutral means.

We estimate that, in meeting our overall goal of 10.36%, that 7.72% of the goal will be attained from race-conscious participation and 2.64% via race-neutral participation measures. This is an attainable goal based on the history of DBE participation in prior projects and the availability of current DBE contractors.

This breakout was established by computing the median of the variance of the level of DBE participation vs. DBE goal on the three projects considered in Step 2 (see page 7) of the overall goal participation computation. The Median Percentage was 2.64% and we felt it is an attainable goal for race-neutral participation. The following is the level of variance in each of the projects:

<b>PROJECT DBE GOAL VARIANCE CULLMAN REGIONAL AIRPORT PREVIOUS FAA PROJECTS</b>				
<b>YEAR</b>	<b>LOCATION</b>	<b>DBE GOAL</b>	<b>% OF DBE PARTICIPATION</b>	<b>VARIANCE</b>
2016	Fairhope	11.00%	13.64%	2.64%*
2012	Headland	10.10%	9.58%	-0.52%
2012	Cullman	9.91%	19.38%	9.47%
* MEDIAN VARIANCE				

F. Contract Goals: The City of Cullman and Cullman County, will use contract goals to meet any portion of the overall goal that the Sponsor 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 applies, 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.

**FISCAL YEAR 2023**

A. Goals - To make the program as useful as possible to the public, The City of Cullman and Cullman County, Cullman, Alabama will update the "amount," "method," and "breakout" portions of this section of the program annually, or as required. The following sections will be submitted to the FAA every year for approval, or as required: Amount of Overall goal section, Method used for establishing overall goals, Process, the Race-Neutral/Race Conscious breakout, and contract goals. The material on overall goals in the DBE program will be a shorter summary of the material submitted annually, or as required, in the overall goal submission.

B. Amount of Goal -The City of Cullman and Cullman County's overall goal for FY 2023 is 9.73% of the Federal financial assistance we will expend in FAA-assisted contracts. The Sponsor

expects to let during FY 2023, \$290,700.00 in construction and engineering contracts which means that we have set a goal of expending \$28,285.00 with DBEs for this Fiscal Year. This overall goal is intended for information of public users of the program, and does not imply that the FAA, as such, has approved the goal.

C. METHOD STEP 1: In the development of the DBE goal for Cullman Regional Airport the first step was to establish the availability of ready, willing and able DBE businesses that were capable of participating in the type of contracts that were programmed during FY 2023. The project that is anticipated at Cullman Regional Airport includes the Parallel Taxiway Rehabilitation, along with the professional effort associated with the project. The monetary size of the project is expected to be \$290,700.00. An analysis of the project indicates that funds will be expended in the following areas:

<b>CULLMAN REGIONAL AIRPORT PROJECT ANALYSIS FY 2023</b>			
<b>TASK</b>	<b>NAICS</b>	<b>AMOUNT</b>	<b>PERCENTAGE</b>
Street/Highway	237310	\$196,200	67.49%
Site Prep	238910	\$13,500	4.65%
Hauling	484220	\$22,500	7.74%
Engineering	541330	\$45,000	15.48%
Testing	541380	\$4,050	1.39%
Consulting	541611	\$9,450	3.25%
<b>TOTAL</b>		<b>\$290,700.00</b>	<b>100.00%</b>

The weighting factor is the value of each work item based on cost as a fraction of the whole project.

The formula to be used to calculate the Base Figure for the DBE goal is as follows:

$$\frac{\text{Total DBE Firms in the State by County/NAICS Code of Work to be Performed}}{\text{Total Firms in the State by County/NAICS Code of Work to be Performed}} \times 100 = \text{Base Figure}$$

A search was initiated for a Directory that would identify firms to accomplish these tasks. It was generally agreed that the most comprehensive directory for DBE firms in Alabama was the DBE Directory that has been established by the Alabama Department of Transportation. This directory contains DBE firms that have been certified in accordance with the requirements for 49 CFR Part 26. The DBE Directory dated September, 2020 was utilized for this project. Past projects experience indicated that bidders came from the counties of Cullman, Marshall, Morgan and Madison counties in Alabama. It was considered reasonable to establish the aforementioned counties as the market area for the FY 2021-FY 2023 projects. The list was further refined by identifying those firms that could participate in the project by their appropriate NAICSSs. The resulting number will be used as the numerator in determining the Base Figure.

The next step in establishing the Base Figure was to determine our denominator. This was accomplished through the use of the Census Bureau's County Business Pattern (CBCBP) and the

identification of the NAICSs that were the same as those identified from the Directory. With these figures in hand we compute our Base Figure using the following mathematics:

$$\frac{Base}{Figure} = .6749 \left( \frac{ANAICS237310}{NAICS237310} \right) + .0465 \left( \frac{ANAICS238910}{NAICS238910} \right) + .0774 \left( \frac{ANAICS484220}{NAICS484220} \right) + .1548 \left( \frac{ANAICS541330}{NAICS541330} \right) + .0139 \left( \frac{ANAICS541380}{NAICS541380} \right) + .0325 \left( \frac{ANAICS541611}{NAICS541611} \right) +$$

ANAICS- Alabama DBE Directory NAICS  
 NAICS – Census Bureau’s County Business Pattern (CBCBP) Data Base

$$\frac{Base}{Figure} = .6749 \left( \frac{2}{20} \right) + .0465 \left( \frac{4}{55} \right) + .0774 \left( \frac{4}{61} \right) + .1548 \left( \frac{6}{331} \right) + .0139 \left( \frac{2}{15} \right) + .0325 \left( \frac{9}{134} \right)$$

$$\frac{Base}{Figure} = .0675 + .0034 + .0051 + .0028 + .0019 + .0022$$

$$\frac{Base}{Figure} = 8.29\%$$

STEP 2: With the Base Figure established our next step was to more finely tailor this figure to reflect conditions which have occurred at Cullman Regional Airport. Currently there are no known disparity studies completed in this area of the State of Alabama. The City of Cullman and Cullman County, has considered the suggested options outlined in 49 CFR Part 26 and determined past performance is the information available to determine if an adjustment to our Base Figure is warranted. It was felt that a sampling of like type projects that have taken place in Alabama would be appropriate for use in determining if an adjustment was required to the Base Figure. To this end, we investigated three airports with like type projects. Each of these airports has received an FAA grant for projects of a similar magnitude and type anticipated at Cullman Regional Airport. Listed below are the projects that were included for analysis. As you will note, each of these projects is of a similar nature as the project that is being anticipated in the 2023 time frame at Cullman Regional Airport.

PREVIOUS FAA PROJECTS			
YEAR	LOCATION	PROJECT TYPE	% OF DBE PARTICIPATION
2015	Cullman	Taxiway Realignment	8.42%
2008	Madison	Parallel Taxiway Rehab	16.02%
2000	Tuscaloosa	Rehabilitate Taxiway	11.16%*
*Median			

The next step was to determine if any adjustment might be needed to the Base Figure. It was determined that the Median of the three projects was 11.16% and it was felt that the Base Figure should be adjusted to cater for this variance.

A summary of this analysis yields the following:

MEDIAN PERCENTAGE	11.16%
BASE FIGURE	+ <u>8.29%</u>
	19.45% ÷ 2 = 9.73%

Satisfied that the Median Percentage was valid, the final step in the comparison was the development of a simple average of the Base Figure and the Median Percentage to establish a final percentage. The result of this was 9.73%. It was felt that the Base Figure of 8.29% should be adjusted for this variance. The Average Percentage of 9.73% is established as the goal for DBE participation at Cullman Regional Airport for FY 2023.

D. PROCESS - The City of Cullman and Cullman County, Cullman, Alabama submits its overall goal for FY 2023 to the FAA in September, 2020, for their consideration and approval. Before establishing the overall goal each year, the Sponsor has personally consulted with stakeholders to obtain information concerning the availability of disadvantaged and non-disadvantaged businesses, and the effects of discrimination on opportunities for DBEs. The Sponsor’s efforts are to establish a level playing field for the participation of DBEs. Following this consultation, The Sponsor has published a notice of the proposed overall goal, informing the public that the proposed goal and its rationale are available for inspection during normal business hours at the Sponsor’s principal office for 30 days following the date of the notice, and informing the public that the Sponsor and FAA will accept comments on the goal for 30 days from the date of the notice. This information was published on the Cullman Regional Airport website, and FAA website, and made available to the Office of Minority Business Development at the State of Alabama. Normally, the Sponsor will issue this notice by June 1 of each year. The notice will include the Sponsor’s address to which comments may be sent. The overall goal submission to the FAA will include a summary of information and comments received during this public participation process and the Sponsor’s responses. We will begin using our overall goal on October 1 of each year, unless we have received other instructions from DOT (or if the goal is established on a project basis, by the time of the first solicitation for a DOT-assisted contract for the project). Consultation discussions were held with the following stakeholders September 23, 2020, 11:00 am CDT with no comments received.

<b>CULLMAN REGIONAL AIRPORT AGENCIES/PERSONS CONSULTED WITH</b>	
Agency/Organization	Discussion/Information
Cullman Regional Airport Mr. Ben Harrison, Airport Manager	Availabilities of DBEs, Directories, small and DBE contracting experience in the local market
GMC Ms. Natalie Hobbs, PE	Availabilities of DBEs, Directories, small and DBE contracting experience in the local market
Taffy Pippin Consulting, LLC Ms. Taffy Pippin, Consultant	Availabilities of DBEs, Directories, small and DBE contracting experience in the local market

Taffy Pippin Consulting, LLC Mr. Clayton Pippin, Planner	Availabilities of DBEs, Directories, small and DBE contracting experience in the local market
---	---

Public comments have been requested for the FY 2023 goal and the 30 day comment period is underway. Any comments received from the public advertisement or the other coordination will be evaluated and necessary changes will be made to the goal and included in the contract documents for the project.

**E. RACE CONSCIOUS AND RACE NEUTRAL GOALS:** The Sponsor will meet the maximum feasible portion of its overall goal by using race-neutral means of facilitating DBE participation. Each time the City of Cullman and Cullman County, submits an overall goal for review by the FAA, the Sponsor will also submit a projection of the portion of the goal that is expected to be met through race-neutral means and the basis for that projection. This projection is subject to approval by the FAA, in conjunction with its review of the Sponsor’s overall goal. The Sponsor has established contract goals to meet any portion of an overall goal when the Sponsor does not project being able to meet goals using race-neutral means.

We estimate that, in meeting our overall goal of 9.73%, that 8.26% of the goal will be attained from race-conscious participation and 1.47% via race-neutral participation measures. This is an attainable goal based on the history of DBE participation in prior projects and the availability of current DBE contractors.

This breakout was established by computing the median of the variance of the level of DBE participation vs. DBE goal on the three projects considered in Step 2 (see page 12) of the overall goal participation computation. The Median Percentage was 1.47% and we felt it is an attainable goal for race-conscious participation. The following is the level of variance in each of the projects:

<b>PROJECT DBE GOAL VARIANCE CULLMAN REGIONAL AIRPORT PREVIOUS FAA PROJECTS</b>				
<b>YEAR</b>	<b>LOCATION</b>	<b>DBE GOAL</b>	<b>% OF DBE PARTICIPATION</b>	<b>VARIANCE</b>
2015	Cullman	11.31%	8.42%	-2.89%
2008	Madison	10.69%	16.02%	5.33%
2000	Tuscaloosa	9.69%	11.16%	1.47%*
* MEDIAN VARIANCE				

**F. Contract Goals:** The City of Cullman and Cullman County, will use contract goals to meet any portion of the overall goal that the Sponsor 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 applies, 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.

**G. THREE YEAR GOAL:** The Three year goal is as follows:

2021 - 9.30%

$$\begin{array}{r} 2022 - 10.36\% \\ 2023 - \frac{+ 9.73\%}{29.39\%} \div 3 = 9.80\% \end{array}$$

*References:*

*Alabama UCP List of Certified DBE Firms, September, 2020*

*2018 – U.S. Census Bureau, September, 2020*