#### Overall DBE Three-Year Goal Methodology

In Accordance with 49 CFR Part 26, Section 26.45

#### (Small-HUB Primary)

Wisconsin Department of Transportation, Bureau of Aeronautics (BOA)

Name of Recipient: Dane County Regional Airport (MSN)

Goal Period: FY 2021, 2022, 2023 (October 1, 2020 through September 30, 2023)

**DOT-assisted contract amount:** 

	MSN
FY-2021 \$	\$13,650,000
FY-2022 \$	\$5,130,000
FY-2023 \$	\$10,620,000
Total \$	\$29,400,000

Overall Three-Year DBE Goal: 2.39% to be accomplished through... 2.21% RC (assigned) and 0.18% RN (voluntary) measures.

Total dollar amount to be expended on DBEs: \$701,747 (DBE goal multiplied by the total dollar amount of anticipated projects over the next three years)

Table Summary of Proposed DBE Participation Goals for Federal-Aid Airport Fun FY 2021, 2022, 2023 (October 1, 2020 through September 30, 2023)

(1 To Joseph To To Table 1 Table 2 To Table									
Airport Name	Anticipated	Overall 3-yr DBE Goal Total		Race-Conscious (Assigned)		Race-Neutral (Voluntary)		Overall Annual DBE Goal	
	Funds	Percent (%)	Dollars (\$)	Percent (%)	Dollars (\$)	Percent (%)	Dollars (\$)	Percent (%)	FY/Dollars (\$)
Dane County Regional Airport (MSN)	\$29 400 000	2.4%	\$701.747	2.2%	\$650,268,70	0.2%	\$51,478,67	2.4%	\$233,916

Anticipated Contracts: Description of the total Number and Type of Contracts that BOA anticipates awarding over the next three fiscal year periods:

(the totals of anticipated contracts reflect the DOT-funded portion of the contract only)

Facility Name	Program Year	Category	Project	Workitem Name	Federal	Total Per FY	3yr Total
			Number		Amount		
Dane County Regional Airport	2021	Noise	MSN1016 (AIP 3	Part 150 Noise Study.c1 (Noise Exposure Maps & Include Runway:	\$1,500,000	\$13,650,000	\$29,400,000
Dane County Regional Airport	2021	Construction	AIP 2021 Constr	Pave Taxiway B shoulders	\$1,872,007		
Dane County Regional Airport	2021	Construction	AIP 2021 Constr	Pave Taxiway B shoulders	\$4,327,993		
Dane County Regional Airport	2021	Construction	AIP 2021 Constr	Rehab/Replace Taxiways B, D, E, and H lighting /signage(LED)	\$1,500,000		
Dane County Regional Airport	2021	Construction	AIP 2021 Constr	Rehabilitate Runway 18/36 shoulders	\$3,150,000		
Dane County Regional Airport	2021	Construction	AIP 2021 Constr	Replace Runway 18/36 Lights	\$1,300,000		
Dane County Regional Airport	2022	Construction	AIP 2022 Constr	Reconstruct terminal access road (International In from Darwin rd &	\$5,130,000	\$5,130,000	
Dane County Regional Airport	2023	Construction	AIP 2023 Constr	Construct Rwy 3/21 Shoulders and Replace Runway 3/21 Lights ar	\$5,258,992	\$10,620,000	
Dane County Regional Airport	2023	Construction	AIP 2023 Constr	Construct Rwy 3/21 Shoulders and Replace Runway 3/21 Lights ar	\$4,191,008		
Dane County Regional Airport	2023	Noise	AIP 2023 Noise	Part 150 Noise Study, Part 2	\$1,170,000		

#### Market Area/Geographic Area: Residing County and Surrounding Counties:

The "geographical area" of an airport is defined by the county in which each airport resides and surrounding counties. The statewide directory is used to determine the DBE goals for Small Hub Primary Airport, Dane County Regional Airport (MSN). All firms located in the selected geographical area are included, but not limited to, determining opportunity for DBE firms in each market area, <u>AND</u> the area in which the airport spends the substantial majority of its contracting dollars. BOA will use this data to determine maximum opportunity and avoid imposing undue burdens on non-DBEs in area.

Market Area: We use raw data from the Wisconisn Department of Transportation's Office of Business Opportunity and Equity Compliance, Civil Rights Compliance System (CRCS), to create our Step 1 percentages. CRCS data shows DBE firms self-identified to work in specific WisDOT Regions and Counties. This data also shows most, but not all of our non-DBE firms identified to work in their market area. For each Primary Airport, we use CRCS data from its Geographical Market Area and the Work Area (Industry) in which the Airport spends the substantial majority of its contracting dollars with construction and professional services where contractors and/or subcontractors can be found to do the types of work on contracts being awarded at the Airport.

The Market Area was used to calculate the total firms Ready, Willing, and Able for work per Industry and Work Type for the airport. Market Area is defined by the county in which the airport resides and surrounding counties (any county within an approximate 60 mile radius and/or statewide searh if applicable to the market area of work), and applies mostly to contractors, consultants, and material suppliers.

Airport Name:	Residing County:	Surrounding Counties:	Region:
Dane County Regional Airport (MSN	Dane	Columbia, Dodge, Green, Iowa, Jefferson, LaFayette, Rock, Sauk	Southwest

# Goal Setting Methodology:

DBE goals will be established for those fiscal years we anticipate awarding DOT-assisted prime contracts exceeding \$250,000 during the three-year period. The DBE goals will be established in accordance with the 2-step process as specified in 49 CFR Part 26.45. If BOA does not anticipate awarding more than \$250,000 in DOT-assisted prime contracts during any of the years within the three-year reporting period, we will not develop an overall goal; however this DBE Program will remain in effect and BOA will seek to fulfill the objectives outlined in 49 CFR Part 26.1.

The regulations require recipients to set overall goals based on demonstrated evidence of the availability of ready, willing, and able DBE's relative to all businesses ready, willing and able (RW&A) to participate on DOT-assisted contracts.

The **first step (Step One Nose Count – SONC)** is to determine the relative availability of DBEs in the market area, "base figure". The **second step** is to adjust the "base figure" percentage from Step 1 so that it reflects as accurately as possible the DBE participation the recipient would expect in the absence of discrimination based on past participation or **History**, a disparity study and/or information about barriers to entry to past competitiveness of DBEs on projects.

SONC represents all firms RW&A to build airports in Wisconsin "equally" just as each State has two Senators in the U. S. Senate. History represents all firms "unequally" just as each State has representation in the U. S. House of Representatives according to its population. (History represents all dollars associated with federally assisted contracts equally). Eventually we will have dollars spent, rather than dollars committed Historical data. SONC is a view of the "ideal"; History, a view of "reality." Using each takes into account the facts that certain companies have developed ability and experience in building Wisconsin transportation facilities over the years ("reality") and certain other companies are being helped by WisDOT to develop ability and experience ("ideal").

We use raw data from OBOEC's Civil Rights Compliance System (CRCS) to create our SONC percentages. CRCS data shows DBE firms self-identified to work in specific work categories and locations. This data also shows most, but not all, non-DBE firms identified to work in their "market area". We use a combined total for the following data sources to calculate the total number of **Ready, Willing, and Able** firms to work on anticipated WisDOT BOA projects.

In establishing the overall goal, BOA will consult with minority, women's and general contractor groups, community organizations, and other officials or organizations to obtain information concerning the availability of disadvantaged and non-disadvantaged businesses, the effects of discrimination on opportunities for DBEs, and the BOA efforts to establish a level playing field for the participation of DBEs.

### STEP 1: Actual relative availability of DBEs

# Step One - Base Figure Analysis:

Under the DBE regulations, BOA must begin the process by determining the base figure for the relative availability of DBEs. BOA refined the availability data by weighting type of work, contractor role, location of work, and size of work. All work classes were selected for each of the following areas: Professional/Consultant and Construction. We divide the numerator by the denominator to arrive at the

# Overall DBE Three-Year Goal Methodology

In Accordance with 49 CFR Part 26, Section 26.45

base figure for our overall DBE goal.

#### The base figure for the relative availability was calculated as follows:

Potential DBE firms ready, willing and able for work: Total Number (#) of DBE firms divided by the Total Number (#) of ALL firms = Base Figure. The number of DBE and Non-DBE firms listed below was derived from the WisDOT Bidders List data and includes all bidders whether they are prime or subcontractors, and whether they were or were not awarded a contract or subcontract.

The base figure calculations is based on the airports market area:

Step 1 base figure = Ready, Willing & Able DBEs (Numerator)

All firms Ready, Willing & Able

(including DBEs and Non-DBEs) (Denominator)

 Numerator (DBE Firms):
 53

 Denomonator (All Firms):
 1043

 Base Figure =
 5.1%

Firms by Work Type - Analysis			
Work Type / Classification	All Firms	DBE Firms	Non-DBE Firms
Aggregates	59	0	59
Airport Construction	60	3	57
Airport Electrical	17	0	17
Architectural Consultant	15	3	12
Asbestos Abatement	5	0	5
Asphalt	12	0	12
Building Construction	77	6	71
Clearing & Grubbing	22	1	21
Concrete	33	0	33
Consultant	63	24	39
Culverts	6	0	6
Design Engineering	9	0	9
Environmental Services	9	0	9
Equipment Supplier	3	0	3
Erosion Control	8	4	4
Fencing	11	1	10
Geotechnical Services	3	0	3
Grading	22	0	22
Incidental Construction	17	0	17
Iron Work	1	0	1
Janitorial Services	7	1	6
Landscaping	9	1	8
Lighting/Signals	12	1	11
Material Supplier	31	1	30
Materials Sampling/Testing	0	0	0
Other Miscellaneous	64	7	57
Painting	4	0	4
Pavement Marking	14	0	14
Sewer/Utility	8	0	8
Staking	1	0	1
Steel Erection/Fabrication	1	0	1
Structures	3	0	3
Survey	6	0	6
Traffic Control/Signing	2	0	2
Trucking	429	0	429
TOTALS:	1043	53	990

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Construction		Professional		OTHER	
All Firms	DBE Firms	All Firms	DBE Firms	All Firms	DBE Firms
59	0	-	-	-	-
60	3	-	-	-	-
17	0	-	-	-	-
-	-	15	3	-	-
5	0	-	-	-	-
12	0	-	-	-	-
77	6	-	-	-	-
22	1	-	-	-	-
33	0	-	-	-	-
63	24	-	-	-	-
6	0	-	-	-	-
-	-	9	0	-	-
-	-	9	0	-	-
-	-	-	-	3	0
8	4	-	-	-	-
11	1	-	-	-	-
-	-	3	0	-	-
22	0	-	-	-	-
17	0	-	-	-	-
1	0	-	-	-	-
7	1	-	-	-	-
9	1	-	-	-	-
12	1	-	-	-	-
31	1	-	-	-	-
-	-	0	0	-	-
64	7	-	-	-	-
4	0	-	-	-	-
14	0	-	-	-	-
8	0	-	-	-	-
-	-	1	0	-	-
1	0	-	-	-	-
3	0	-	-	-	-
-	-	6	0	-	-
2	0	-	-	-	-
429	0	-	-	-	-
997	50	43	3	3	0

Actual Relative Availability of DBE Firms Ready, Willing and Able for Work = 5.1%

The data source or demonstrable evidence used to derive the **numerator** is: **WisDOT Bidders List**, Ready Willing and Able firms. The data source or demonstrable evidence used to derive the **denominator** is: **WisDOT Bidders List**, Ready Willing and Able firms.

The **bidders list** information can be found on the Civil Rights Compliance System (CRCS) webpage: https://wisdot.ecomply.us/Reports/RWAReport.asmy2HiddeProjectListViewstrue&RidderListstrue

State of Wisconsin Unified Certification Program (UCP) DBE Directory (this is an optional resource for DBE data but is more broad with market area and geographic location for work):
Wisconsin Department of Transportation Unified Certification Program (UCP) DBE certified firms (wisconsindot.gov)

Step 1b: Weights used are proportion of dollars spent within each industry/trade: resulting percentage is more heavily influenced by availability in idustries/trades where more dollars are spent. This method is used to arrive at a more accurate base figure. The (weight) percent equals the amount of federal funding that will be available for DBE firm subcontracting opportunities. The weighted percent final calculation is represented by contracting opportunities in construction and professional services, the misc/other/equipment total was not used in the final calculations as there are no subcontractor

opportunities for those contracts and will not be setting a DBE goal on the contract. The base figure for the relative availability was calculated as follows

| Anticipated Contract Type per Industry: | Construction / | Building & Airport | Safety Area | Miscellaneous / | Project Land: Equipment Total Dollar Amount (\$) and Percentage (%) per Industry Pavement: Structures: Electrical: Other: Development: Purchase: Improvements Anticipated Runway, Taxiway, Apron, Access Road, arking Lot Construction and Pavement Rehabilitation, Joint Seal, Seal Coating, Terminal Bldg, Hangar, Aircraft Fire and Rescue Bldg, Snow Equipment Removal Bldg, Parking Garage, Lighting, NAVAIDs, REILs and PAPIs, Airport Weather Observation Stations (AWOS) Parking Lot Canopies, Obstruction Removal . Approach Clearing, Fur Farm, Passenger Boarding Bridge Master Plan, Design,
Engineering,
Construction Admin
(Resident Engineering)
Testing, Survey,
Environmental Studies Security, Fencing, Signage, Drainage, Noise Mitigation Real Estate, Survery SRE AREE Training Type and Contract Work Category Contract Amount Equipment / Professional Construction Other / Misc. \$975,000 \$7,350,000 Dollar (\$) Amount of Federal Funding \$19,072,500 \$0 \$2,002,500 \$0 \$0 \$0 \$29,400,000 Percent (%) of Federal Funding 65% 0% 3% 0% 25% 0% 0% 100%

Anticipated Federal Funding Projection:	Construction	Professional	Equipment	Total
Dollar (\$) Amount of Federal Funding:	\$22,050,000	\$7,350,000	\$0	\$29,400,000
Percent (%) of Federal Funding	75%	25%	0%	100%

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Dividing the weighted DBE totals by the total estimate for all trades gives a base DBE availability figure for the projects anticipated during the goal-setting period. This figure is expressed as a percentage and

Airport	Industry	Anticipated Contract Dollars (\$)	(weight)	DBEs (Bidders List)	All Firms (Bidders List)	Weighted %	Weighted Base Figure Percent (%)	Weighted Base Figure Dollars (\$)
	Construction	\$22,050,000	75%	50	997	2.82%		
Dane County Regional Airport	Professional Services	\$7,350,000	25%	3	43	0.44%	0.000/	¢057 500 70
(MSN)	Misc/Other/Equipment	\$0	0%	0	3	N/A	3.26%	\$957,560.76
, ,	Total:	\$29,400,000	100%	53	1043	3.26%		

#### Weighted Totals - Projections:

Fiscal Year Period	DBE (\$)	Non-DBE (\$)	Anticipated Total Dollars (\$)
FY 2021	\$444,582	\$13,205,418	\$13,650,000
FY2022	\$167,085	\$4,962,915	\$5,130,000
FY2023	\$345,894	\$10,274,106	\$10,620,000
Total:	\$957,561	\$28,442,439	\$29,400,000

Average of Weighted Availability = 3.26%

### Step 2: Adjustments to Step 1 Base Figure (Five-Year Past History Participation)

After calcuating a base figure of the relative availability of DBEs, evidence was examined to determine adjustments to the base figure was needed in order to arrive at the overall goal. To arrive at an overall goal, the Step 1 base figure was added to the Step 2 adjustment figure and the total was averaged, arriving at an overall goal listed below. The Bureau of Aeronautics believes this adjusted goal accurately reflects DBE participation that can be achieved for the types of work awarded during this three-year period.

#### Five Year History of DBE Accomplishments: AVERAGE-program method (Overall Annual DBE Goal for next three years)

Our proposed Overall 3-yr DBE Goal will be reflected as a weighted percentage per fiscal year for DBE participation on anticipated contracts, the past five-year history of data represents the combined average over the five year period of accomplishments, and the DBE firms available is represented as an average percent per industry type and types of work typically included in those categories. We use data from our five-year History of Commitments to Subcontract to DBE firms to produce the Overall Triannual DBE Goals. We combine Professional/Consultant and Construction DBE Goals, weighted by average of participated contract work for future contracts, to produce the **Overall Annual DBE Goal**.

# History of Past Participation (5-yr] (FY2015-2016-2017-2018-2019)

Five-Year History of Contracts Awarded and DBE Participation (Commitments and Accomplishments)

Industry	Total DBE Commitment &	nt & DBE Goals & Commitments			DBE Accomplishments
industry	Actual Payment Amount	RC	RN	Total	DBE Accomplishments
Construction	\$37,713,538	\$830,070	\$1,193,766	\$2,023,836	5.4%
Professional	\$7,188,949	\$197,732	\$30,833	\$228,564	3.2%

#### **Explanation of Spreadsheet Calculations:**

We compute Annual Consultant and Construction Goals (light green area above) for FAA-assisted work using the equation "Goal = (SONC + History) / 2", where SONC (Step One Nose Count) is defined as the percentage of DBE firms ready, willing and able (RW&A) to do aeronautics work among all firms so RW&A; and History is the percentage of dollars committed to DBE firms to dollars initially contracted to Prime Contractors and/or Consultants through FAA-assisted contracts in the past three years. BOA feels that this adjusted goal figure will accurately reflect DBE participation that can be achieved for the type of contract (industry and related work categories) in which the Airport anticipates awarding during the three-year period.

Adjustments to the DBE Goal Base Figure, factor Average Program and the DBE participation five-year history, and yields an overall goal detailed in the table below

Adjustments to the DBE Goal Base Figure, factor Average Program and the DBE participation five-year history, and yields an overall goal detailed in the table below:								
Step 1 - Base Figure	Step 2 - Ad	Step 2 - Adjustments (as a reflection of past history)				stry Average		Anticipated Projects
SONC: Step One Nose Count	History: de	rived from Commit to	Sub to DBE data	1	2021-2023 Goa	l Computations		2021-2023 Average Program:
					Goal is proportion	oned RC/RN in sa	me ratio as	Anticipated AIP Spending
Derived from the WisDOT Bidders List	Dollars of C	ommitments to DBE	firms made by Pr	imes to WisDOT	occurred in Rec	ipient's FIVE-year	history	(Appendix A)
Recipient SO	NC 5 year To	tal 5 year RC	5 year RN	HISTORY	Goal	RC	RN	Dollars
DBEs RW&A / All Firms	s RW&A							
Firms RW&A to Construct on AIP F	Projects Constructi	ng dollars			Constructing C	Goals		
Dane County Regional Airport								
(MSN) 2.8	32% \$37,713,5	<b>38</b> \$830,070	\$52,031	2.34%	2.58%	2.43%	0.15%	\$22,050,000
Firms RW&A to Consult on AIP F	Projects Consulting	dollars			Consulting Go	als		
Dane County Regional Airport								
(MSN) <b>0.4</b>	14% \$7,188,9 <sub>4</sub>	<b>19</b> \$197,732	\$30,833	3.18%	1.81%	1.56%	0.24%	\$7,350,000

# Note: Bolded numbers are used "to the right or below or to the left" in further computations on this sheet

To arrive at an overall goal, the Step 1 base figure was added to the Step 2 adjustment figure and the total was averaged, arriving at an overall goal for each Non-Hub Primary Airport listed below. The Bureau of Aeronautics believes this adjusted goal accurately reflects DBE participation that can be achieved for the type(s) of work being awarded during this three-year period.

Overall DBE Goal, with RC & RN portions:	Total	RC	RN	
Overall DBE Goal, with RC & RN portions:	Goal %	Assigned %	Voluntary %	
Dane County Regional Airport (MSN)	2.4%	2.2%	0.2%	

# Breakout of Race Neutral (RN) and Race Conscience (RC) Participation:

Once a Consultant or Construction Annual Goal is computed, then we divide it into Race Conscious (RC) and Race Neutral (RN) components using the ratio of RC and RN commitment in the past three years of History. For example, if there were 2/3 RC and 1/3 RN commitment in the past five years then we divide the Annual Goal into 2/3 RC and 1/3 RN.

Furthermore, there are no applicable disparity studies for the local market area or recent legal case information from the relevant jurisdictions to show evidence of barriers to entry or competitiveness of DBEs in the market area that is sufficient to warrant making an adjustment to the base goal.

The efforts made by Bureau of Aeronautics (BOA) in partnership with WisDOT's Office of Business Opportunity and Equity Compliance (OBOEC) to promote DBE opportunity in a race neutral fashion for all transportation modes are highlighted in the WisDOT Annual DBE Goal submission to FHWA.

The FY2021-2023 Program of Anticipated Project work is the last section of this submission. This includes only the FAA-assisted consultant and construction work, and will <u>not</u> include the dollar amounts for contracts in which BOA does not anticipate assigning a DBE Goal to the contract (i.e., OTHER / MISC. / Purchase of Airport EQUIPMENT).

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For reporting purposes, RN DBE participation includes, but is not limited to, the following: DBE Participation through a prime contract a DBE obtains through customary competition 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.

BOA will make an additional adjustment for the amount work involving LAND ACQUISITION and OTHER categories for anticipated funding. Because the majority of the funding for these types of projects are not available for firms to perform work, all participation involving DBE work will count as RN achievement only. The type of work for these contracts are reflected in the overall calculation of surveyed firms but will not be used as part of the RC calculations.

BOA will maintain data separately on DBE achievements in those Federal-aid contracts with and without contract goals, respectively.

#### **DBF Contract Goals**

Nearly all FAA-assisted contracts administered by WisDOT have DBE **Contract** Goals. Security equipment and land purchases have contracts that may not have contract goals. Contract Goals utilize the RC / RN ratios established for Annual Goals. The **Date** of signing a consultant contract or the bid date of a construction contract determines "FAA-assisted-ness" and, if so, into which FFY (Oct. 1 to Sept.

BOA will use contract goals to meet any portion of the overall goal that the recipient does not project being able to meet using RN 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 the recipient's overall goal that is not projected to be met through the use of RN means.

BOA will establish contract goals only on those DOT-assisted contracts that have subcontracting possibilities. It need not establish a contract goal on every such contract, and the size of the contract goals will be adapted to the circumstances of each such contract (e.g., type and location of work and availability of DBE's to perform the particular type of work). We will express our contract goals as a percentage of the total amount of a DOT-assisted contract.

<u>Public Participation</u> (Small-HUB Primary) Dane County Regional Airport (MSN)

The Bureau of Aeronautics submitted its overall 3-year goal to FAA on November 16th, 2021, applicable for a 30-day public comment period, and finalized for projects bid on or after **December 16, 2021** through **September 30, 2023**.

#### Consultation:

In establishing the overall goal, the Bureau of Aeronautics provided for consultation and publication. This process included consultation with minority, women's, and general contractor groups, community organizations, and other officials or organizations which could be expected to have information concerning the availability of disadvantaged and non-disadvantaged businesses, the effects of discrimination on opportunities for DBEs, and the Bureaus's efforts to establish a level playing field for the participation of DBEs. The consultation included a scheduled, direct, interactive exchange with as many interested stakeholders as possible focused on obtaining information relevant to the goal setting process, and was conducted before the goal methodology was submitted to the operating administration, the Federal Aviation Administration (FAA), for review. Details of the consultation are as follows.

The consultation engaged in was as follows;

Description	Nature of Consultation	Date	Time	Location
WisDOT TrANS-AC Stakeholder Me	Teleconference	11/16/2021	1pm	Phone
WisDOT DBE Program Website	Publication	11/16/2021	3pm	https://wisconsindot.gov/Pages/doing-bus/civil-rights/dbe/plans-and-goals.aspx
WisDOT Aeronautics Website	Publication	11/16/2021	3pm	TBA
Newspaper, WI State Journal	Annoucement of Goal and instructions for commer	11/17/2021	N/A	Publication

The proposed goals and rationale is available for public inspection at its Central State Office Bldg., Bureau of Aeronautics between the hours of 8:00 a.m. and 4:30 p.m. Monday through Friday for 30 days following the publication of this notice.

Written comments pertaining to this goal should be sent to the attention of:

# Shannon Clary, DBE Program Manager

WI Dept. of Transportation, Bureau of Aeronautics 4822 Madison Yards Way, 5th Floor South Madison, WI 53705 Tel: (608) 264-7607

Fax: (608) 267-6748 Shannon.Clary@dot.wi.gov

The following **comments** were received during the course of the consultation:

The fellenting comments there received dailing the coulder of the community					
Comment	Description/Summary	Date	Time	WisDOT/BOA Response	
N/A	N/A	N/A	N/A	N/A	

A notice of the proposed goal was published on the Office of Business Opportunity and Equpity Compliance (OBOEC) and Bureau of Aeronautics (BOA) official before the methodology was submitted to the Federal Aviation Administration (FAA).