



TUCSON AIRPORT AUTHORITY
DBE PROGRAM 2024-2026
49 CFR PART 21

APPROVED BY: 
Danette M. Bewley, A.A.E., President/CEO

1. TITLE VI POLICY STATEMENT¹

TITLE VI, CIVIL RIGHTS ACT OF 1964 NONDISCRIMINATION POLICY STATEMENT

Policy No.	2023-12
Effective Date	9/6/2023
Authorized By	President/CEO
Supersedes Policy No.	New Policy

Tucson Airport Authority (TAA) assures that no person shall on the grounds of race, color, national origin, sex, sexual orientation, gender identity, creed, age, or disability (hereafter, the "protected bases"), as provided by Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987 (PL 100.259), and the Section 520 of the Airport and Airway Improvement Act of 1982, and related authorities (hereafter, "Title VI and related requirements"), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity.


TAA further assures every effort will be made to ensure nondiscrimination in all of its programs and activities, whether those programs are federally funded or not. Any time communities may be impacted by programs or activities, every effort will be made to involve them and the general public in the decision-making process.

TAA requires nondiscrimination assurances, as proscribed by FAA, from each tenant, contractor, and concessionaire providing an activity, service, or facility at the airport. Assurances must be included in any related lease, contract, or franchise agreement between TAA and each tenant, contractor, and concessionaire, as well as in any similar agreements with their own sub-tenants and sub-contractors.

TAA's Title VI Coordinator (Bert Resimont, 520-573-4892, bresimont@flytucson.com) is the point of contact for all Title VI matters and related responsibilities, including those required by 49 CFR Part 21.

Adopted by TAA Board of Directors: September 6, 2023

Authorized by:



Danette Bewley
President/CEO

9/6/23

Date

¹ This policy statement will be translated into languages other than English, upon request and based on patron and local language demographics.

**A RESOLUTION OF THE BOARD OF DIRECTORS OF THE TUCSON AIRPORT AUTHORITY, INC.,
APPROVING TAA'S FAA PART 21 NONDISCRIMINATION PROGRAM AND POLICY STATEMENT.**

WHEREAS the U.S. Department of Transportation (USDOT) requires entities receiving grants from the Federal Aviation Administration (FAA) under 49 CFR Part 21 to ensure that no person shall on the grounds of race, color, national origin, sex, sexual orientation, gender identity, creed, age, or disability (hereafter, the "protected bases"), as provided by Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987 (PL 100.259), and the Section 520 of the Airport and Airway Improvement Act of 1982, and related authorities (hereafter, "Title VI and related requirements"), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity; and

WHEREAS TAA desires to apply for and receive such grants from the FAA for its various construction projects; and

WHEREAS USDOT regulations require TAA to create a Nondiscrimination Program and adopt and circulate a policy statement expressing its commitment to the Program, stating its objectives and outlining responsibilities for its implementation; and

WHEREAS the Board of Directors accepts the staff recommendations as outlined in the attached Policy Statement and the Board Memorandum.


NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF DIRECTORS OF THE TUCSON AIRPORT AUTHORITY, INC., AS FOLLOWS:

The President/CEO or her designee[s]) is hereby authorized to adopt the Nondiscrimination Program, to execute the *Title VI, Civil Rights Act of 1964 Nondiscrimination Policy Statement* (attached hereto as Exhibit A and incorporated by reference herein), to submit this Program to the Federal Aviation Administration (FAA), and to take any further actions which are necessary to comply with applicable federal regulations.


PASSED AND ADOPTED by the Board of Directors of the Tucson Airport Authority, Inc., this sixth day of September, 2023.


Keri Silvyn (Sep 8, 2023 08:39 PDT)
Keri Silvyn, Chair of the Board

ATTEST:


Phil Swaim (Sep 7, 2023 16:57 PDT)
Phil Swaim, Secretary

APPROVED AS TO FORM:


Chris Schmaltz (Sep 8, 2023 12:46 PDT)
Christopher Schmaltz, Vice President
and General Counsel

Equal Employment Opportunity

Policy No.	2021-68
Date	09/17/2021
Authorized By	D. Bewley
Supersedes Policy No.	2021-09

Equal Employment Opportunity Policy

Tucson Airport Authority (TAA) is an Equal Opportunity Employer that does not discriminate on the basis of actual or perceived race, color, creed, religion, national origin, ancestry, citizenship status, age, sex, or gender (including pregnancy, childbirth and pregnancy-related conditions), gender identity and expression (including transgender status), sexual orientation, marital status, military service and veteran status, physical or mental disability, genetic information, or any other characteristic protected by applicable federal, state or local laws and ordinances. TAA's management team is dedicated to this policy with respect to recruitment, hiring, placement, promotion, transfer, training, compensation, benefits, team member activities, access to facilities and programs and general treatment during employment.

Disabilities and Reasonable Accommodations

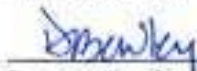
TAA will endeavor to make a reasonable accommodation of an otherwise qualified applicant or team member related to an individual's: physical or mental disability; sincerely held religious beliefs and practices; and/or any other reason required by applicable law, unless doing so would impose an undue hardship upon TAA's business operations.

Any applicant or team member who needs an accommodation in order to perform the essential functions of the job should contact the Director of People Operations to request such an accommodation. The individual should specify what accommodation is needed to perform the job and submit supporting documentation explaining the basis for the requested accommodation, to the extent permitted and in accordance with applicable law. TAA then will review and analyze the request, including engaging in an interactive process with the employee or applicant, to identify if such an accommodation can be made. TAA will evaluate requested accommodations, and as appropriate, identify other possible accommodations, if any. The individual will be notified of TAA's decision regarding the request within a reasonable period. TAA treats all medical information submitted as part of the accommodation process in a confidential manner.

Anti-Retaliation and Reporting Procedure

Any team members with questions or concerns about equal employment opportunities in the workplace are encouraged to bring these issues to the attention of the Director of People Operations and/or the team member's Vice President. TAA will not allow any form of retaliation against individuals who raise issues of equal employment opportunity. If team members feel they have been subjected to any such retaliation, they should contact the Director of People Operations and/or the team member's Vice President. To ensure our workplace is free of artificial barriers, violation of this policy including any improper retaliatory conduct will lead to discipline, up to and including discharge. All team members must cooperate with all investigations conducted pursuant to this policy.

Authorized by:



Danette Bewley
President/CEO

9/22/21

Date:

Zero Tolerance Anti-Harassment

Policy No.	2022-07
Date	10/07/2022
Authorized By	D. Bewley
Supersedes Policy No.	2021-13

Anti-Harassment Policy

The Tucson Airport Authority (TAA) is committed to maintaining a work environment in which all individuals are treated with respect, fairness, and dignity. Every individual has the right to work in an atmosphere that promotes equal opportunities, free from harassment and retaliation. This policy applies to all TAA employees, non-TAA employees, the public, and to persons working under contract with TAA.

Definitions of Harassment:

- A. Sexual harassment constitutes unwelcome sexual advances, requests for sexual favors, and other verbal or physical harassment of a sexual nature. Under the Equal Employment Opportunity Commission guidelines, sexual harassment occurs when a person is subject to that unwelcome conduct when (1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment, (2) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual, or (3) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.
- B. Harassment on the basis of any other protected characteristic is also strictly prohibited. Under this policy, harassment is verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of race, color, national origin, sex (including pregnancy, gender identity and/or expression, and sexual orientation), religion, disability, age (age 40 or older), or genetic information, and that: (i) has the purpose or effect of creating an intimidating, hostile, or offensive work environment, (ii) has the purpose or effect of unreasonably interfering with an individual's work performance; or (iii) otherwise adversely affects an individual's employment opportunities.

Harassing conduct includes, but is not limited to, the following: (i) epithets, slurs, negative stereotyping, or threatening, intimidating, or hostile acts, that relate to race, color, national origin, sex (including pregnancy, gender identity and/or expression, and sexual orientation), religion, disability, age (age 40 or older), or genetic information; and (ii) written or graphic material that denigrates or shows hostility or aversion toward an individual or group because of race, color, religion, national origin, age, sex, sexual orientation, gender identity and/or

expression, or disability and that is placed on walls, bulletin boards, or elsewhere in the workplace or circulated in the workplace. While certain classes have legal protection against harassment, TAA has zero tolerance of harassment as defined above for any TAA employee, contractor, or tenant.

Personal Response to Unlawful Harassment:

A person who has experienced harassment has no legal responsibility to confront or complain to the offender. A harassed individual, at his/her option, may go directly to his/her immediate supervisor, the head of the department, a Vice President, or a member of the People Operations department to get assistance in dealing with the problem without saying anything to the offending party. However, if you are on the receiving end of minor harassment, you might be able to build positive communications and help both you and the offender by telling the offender that you are upset by his/her action. This may help the offender by educating that person about unlawful harassment. The person who is offensive might be willing to change his/her behavior if given this feedback in a calm but firm manner.

If for any reason you are not comfortable with talking to the offender about his/her harassment actions, you should immediately seek help directly from your immediate supervisor, the head of the department, a Vice President, or our People Operations department. If a supervisor is informed of a harassment situation, they must immediately inform People Operations, and their department head and/or Vice President.

Supervisors must be especially aware. Team members who are willing to speak to each other when they are offended, may be reluctant to confront a supervisor about feeling harassed. Supervisors should actively monitor their own conduct and that of their subordinates to make sure it meets professional standards.

All reports of harassment shall remain confidential to the extent reasonably permitted by the investigation. No retaliation or other adverse employment action will result from reports of harassment made in good faith pursuant to this policy.

Discipline:

TAA will not tolerate any form of harassment. The type of discipline to which an employee may be subject for harassing another employee will depend on the severity of the findings. Discipline may range from verbal counseling up to and including termination.

POLICY NO. 2022-07 | ZERO TOLERANCE AGAINST HARASSMENT

2

Authorized by:



Danette Bewley
President/CEO

10/7/22

Date

POLICY NO. 2022-07 | ZERO TOLERANCE AGAINST HARASSMENT

3

2. ADMINISTRATION

Tucson Airport Authority (TAA) has reviewed and adopted this Title VI Program for Tucson International Airport and Ryan Airfield. This plan will be updated no less than once every 3 years. The plan will not be re-adopted following minor changes, such as updating the President/CEO or Coordinator's name. Significant revisions to our policies or federal guidelines may warrant re-adoption by the TAA and resubmittal to the FAA.

In addition to the Coordinator and airport sponsor's leadership, the following people also assist with our Title VI Program Requirements:

Staff Supporting Title VI Program	Airport Sponsor Program / Office
<i>Tina Moore</i>	<i>Programs and Regulatory Compliance</i>
<i>Bert Resimont</i>	<i>Programs and Regulatory Compliance</i>
<i>Aaron Duckworth</i>	<i>Safety Programs</i>
<i>Kim DeLa Torre</i>	<i>People Operations</i>
<i>Ken Nichols</i>	<i>Planning and Engineering</i>
<i>Victor Palma</i>	<i>Civil Development</i>
<i>Adam Kretschmer</i>	<i>Maintenance & Custodial Services</i>
<i>Kathy Myers</i>	<i>Procurement</i>
<i>Emin Aydin</i>	<i>Properties and Concessions</i>
<i>Brian Kidd</i>	<i>Marketing</i>
<i>Scott Bader</i>	<i>Police</i>
<i>Tom Tucker</i>	<i>Fire</i>
<i>Jayna Donahue</i>	<i>Airport Communications</i>
<i>Executive Team</i>	<i>Executive Team</i>

TAA has the following program sub-recipients:

Sub-Recipients
<i>None</i>

As of the date of this plan, TAA has the following pending applications for Federal Financial assistance:

Federal Source	Grant Number	Amount
<i>FAA AIP</i>	<i>3-04-0045-94-2023</i>	<i>\$14,000,000</i>
<i>FAA AIP</i>	<i>3-04-0045-__-202_ (ASE Land Acquisition)</i>	<i>\$17,301,400</i>
<i>FAA AIP</i>	<i>3-04-0045-__-202_ (ASE DBB3 Design)</i>	<i>\$2,837,444</i>
<i>FAA AIP</i>	<i>3-04-0044-03_-202_ (RYN Tower Equipment)</i>	<i>\$637,420</i>

Updated information for pending and awarded grant applications will be available through the following methods:

Federal Source	Grant Award Information Available at:
<i>FAA AIP</i>	<i>https://www.faa.gov/airports/aip/</i>

3. GRANT AND PROCUREMENT ASSURANCES

49 CFR Part 21.7 (a)(1), 49 CFR Part 21 Appendix C (b)

TAA will complete standard grant assurances for Title VI and Related requirements, in the form prescribed by the FAA. See https://www.faa.gov/airports/aip/grant_assurances/#current-assurances

Clauses / Covenants

- a. All contracts, leases, deeds, licenses, permits or other similar instruments, must contain the contractual requirements and clauses, in the form prescribed by the FAA. See https://www.faa.gov/airports/aip/procurement/federal_contract_provisions/. Note that unlike many other clauses, Civil Rights clauses are required in all contracts. Note also special clauses that are required for certain types of contracts, such as land acquisition.
- b. TAA requires Civil Rights clauses to be included in solicitations and contracts for all subcontractors, subleases, and other agreements.

Description of Oversight Methods for Subcontracts

TAA includes Civil Rights non-discrimination clauses in contracts and periodically checks subrecipient and subcontractor agreements for inclusion of those clauses. A subcontract template must be used in all subcontracts related to the airport program. Subcontracts are audited by the Procurement Department to verify they include the template language, for not less than 10 percent of contractors each year.

4. TITLE VI COORDINATOR RESPONSIBILITIES

The Coordinator is responsible for ensuring that they and other staff supporting the Title VI plan are trained in Title VI requirements. Essential training topics include:

- Basic Title VI requirements
- Airport language assistance resources and practices
- Collecting and assessing demographic data
- Reporting Title VI complaints and other required FAA notifications

See Training Section for more information for expected training for all staff.

Among other responsibilities, the Coordinator:

- Proactively ensures that TAA is in compliance with nondiscrimination requirements of Title VI and reports to TAA leadership on the status of Title VI compliances.
- Responds promptly to requests by FAA for data and records and for the scheduling of compliance reviews and other FAA meetings to determine compliance with Title VI and related requirements.
- Receives discrimination complaints covered by Title VI and related requirements, and forwards them to the FAA, within 15 days of receipt, together with any actions taken to resolve the matter.
- Provides the FAA with updates regarding its response and status of early resolution efforts to complaints concerning Title VI and related requirements (49 CFR Part 21, Appendix C(b)(3)), including resolution efforts.
- Annually reviews the airport's Title VI plan and disseminates information throughout staff and the Airport Sponsor's leadership.
- Coordinates data collection to evaluate whether racial or ethnic groups are unequally benefited or impacted by airport programs. The data will be regularly assessed and readily available upon request (49 CFR § 21.9(b) & (c)). Data collection methods will include optional demographic questions in: airport customer satisfaction surveys, customer complaints, airport event sign-in sheets, and bids/proposals for airport contracts, and other methods described in the airport Community Participation Plan (CPP).
- Maintains demographic data for members of appointed planning and advisory bodies for the airport. Identifies any disparities compared to the community. Provides information to the membership selecting official/committee, particularly when vacancies occur.
- Maintains a copy of 49 CFR Part 21 for inspection by any person asking for it during normal working hours (49 CFR 21, Appendix C (b)(2)(i)).

See Notice, Compliance reviews, Audits, Lawsuits, and Other Investigations, and Complaints Sections of this Plan. The Coordinator has requested and received access to the Title VI portion of the FAA Civil Rights Connect System (<https://faa.civilrightsconnect.com/>).

5. NOTICE

49 CFR Part 21 Appendix C(b)(2)(ii)

TAA will conspicuously display the FAA-provided Unlawful Discrimination Poster in all public areas on airport property, including those with pedestrian activity. The Coordinator ensures that these posters are visible, accessible,² and maintained. The poster template is available at https://www.faa.gov/about/office_org/headquarters_offices/acr/com_civ_support/non_disc_pr/ and a completed copy is attached.

TAA has posted the above Title VI policy statement at its staff offices.

TAA will distribute this Title VI Plan among its employees and airport contractors, concessionaires, lessees, and tenants. This plan will be distributed by December 31, 2023 by hard copy or email.

Posters are displayed in each terminal and other areas on airport property, including the following public locations:

Terminal/FBO/Concessions/ Other Locations	Quantity in Pre-Security Area	Quantity in Post-Security Area	Additional Quantities
<i>Terminal A</i>	4	2	
<i>Terminal B</i>	4	2	1
<i>Rental Car Building</i>	1		1
Rental Car/Parking Garage Elevators	3		
Terminal A Custodial Office			1
Police Department			1
Fire Department			1
Terminal B Badging Office			1
Warehouse			1
Maintenance			1
Terminal C (Temporarily Closed)	1	1	
Old Control Tower			1

Outreach to Affected Communities

The TAA Marketing Department ensures that notices for public meetings reach all segments of the impacted community. The Title VI coordinator will identify the effective media platforms to share announcement and notices. Announcements are made in social media, general circulation newspapers, community newspapers, email broadcast, and outreach events. The Title VI Coordinator contacts leaders and representatives in Affected Communities directly to confirm effective media platforms to reach all Affected Communities³ and provide important feedback on translated materials. The office maintains records of all such notices and the efforts made to reach each of the Affected Communities.

² For more information about website accessibility, please visit ADA.gov.

² For more information about website accessibility, please visit ADA.gov.

³ We will not subject any persons to discrimination based on race, color, national origin, age, sex, or creed. The term “protected communities” is used within this Title VI Plan to highlight the requirements of Title VI, 49 U.S.C. §

TAA will create a detailed Community Participation Plan (CPP) by December 1, 2024. A copy of the plan will be available at <https://www.flytucson.com/taa/nondiscrimination-policies/>.

To ensure that the community is effectively informed of and able to participate in public hearings, TAA’s Director of Marketing, Communications and External Relations includes public notices translated in appropriate languages, including for any language spoken by a significant number or proportion of the Affected Community population that has limited English proficiency (LEP). Such social media postings and notices will include direction for obtaining an interpreter, free of charge, for public hearings. See 28 CFR § 42.405(d). See Limited English Proficiency (LEP) Section.

6. COMMUNITY STATISTICS

Title VI regulations require Federal grant recipients to know their community demographics. See 49 CFR § 21.9(b). By knowing this information, the TAA will be able to identify, understand, and engage with communities. In doing so, the TAA needs to know about communities eligible to be served, actually or potentially affected, benefited or burdened by TAA’s airport program.

Affected Communities ⁴	Population
<i>Sunnyside Neighborhood</i>	<i>54,853 (2020 Census)</i>

47123, the Age Discrimination Act of 1975, and in some instances, includes low-income populations under Executive Order 12898.

⁴ “Affected communities” means any readily identifiable group potentially impacted by an airport project or operation, such as the community immediately surrounding a project or a community in the flight path. (Hereafter, the above communities will be referred to collectively as “the Affected Communities”).

We have identified the following facts about the Affected Communities:

Low Income Communities⁵.

A low-income area is an identifiable group of persons living in geographic proximity, whose median household income is at or below the Department of Health and Human Services poverty guidelines. Pursuant to Executive Order 12898, “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations,” TAA is collecting information about affected and potentially affected low-income communities. According to the FAA’s Aviation Environmental Design Tool (AEDT), which identified minority and low-income populations as part of the TUS 2018 Environmental Impact Statement (EIS) addressing the implementation of the Airfield Safety Enhancement Project (ASE), the overall poverty level for the affected community known as Sunnyside Neighborhood is approximately 85.4%. The poverty rate remains low compared with the rest of U.S. neighborhoods. The poverty rates for the specific Affected Communities are as follows:

Affected Communities	Poverty Rate
<i>Sunnyside Neighborhood</i>	<i>25.4%</i>

Racial and Ethnic Communities

Demographic data for race, color, and national origin was evaluated to identify minority communities and populations in each Affected Community. The demographic composition by race, color, or national origin for the specific Affected Communities are as follows⁶.

Affected Community: Sunnyside Neighborhood
Total Affected Community Population: 54,853

Demographic Group within Affected Community	Number of People in Minority Group	Percent of Total Affected Community Population
<i>Hispanic or Latino</i>	44,874	82%
<i>Some Other Race</i>	19,030	35%
<i>White</i>	15,702	29%
<i>Two or More Races</i>	15,530	28%
<i>Not Hispanic or Latino</i>	5,904	11%
<i>American Indian and Alaska Native</i>	2,301	.04%
<i>Black or African American</i>	1,732	.03%
<i>Asian</i>	516	.009%
<i>Native Hawaiian and Other Pacific Islander</i>	42	.0008%

⁵ Low-income data must be collected to assist in our compliance with Environmental Justice requirements (not Title VI requirements). For example, this data will be utilized in our Community Participation Plan (CPP) to help ensure the meaningful involvement of low-income communities in airport programs and activities.

⁶ Recommend using demographic groups from the U.S. Census.

Limited English Proficiency (LEP)

The goal of all language access planning and implementation is to ensure that TAA communicates effectively with limited English proficient (LEP) individuals. Effective language access requires self-assessment and planning. The next table lists non-English languages⁷ that are spoken in LEP households in the Affected Communities. The data source is the U.S. Census Bureau.

The threshold we have used for identifying the languages with significant LEP populations is the DOT LEP Policy Guidance safe harbor threshold, which is 5% or 1,000, whichever is less.⁸ The safe harbor for our community is 1000. Please refer to the end of this document to find data for all languages in our community.

⁷ Recommend using language groups from the U.S. Census, and using data for the “Speak English less than ‘very well’” category for each language over the threshold.

⁸ See the DOT LEP Policy Guidance at <https://www.federalregister.gov/d/05-23972/p-133>. The safe harbor provisions apply to the translation of written documents only; however, it provides a consistent starting point for identifying significant LEP populations.

Languages Spoken by LEP Population that Meet the Safe Harbor Threshold	Number	Margin of Error
<i>Spanish</i>	13,191	+/-1,144

Frequency of contact with LEP individuals at the airport and airport-related activities (all languages):

Languages Spoken by LEP Persons	A few times a year (12 or less days a year)	Several times a month (13 to 51 days a year)	At least once a week (52 to 364 days a year)	Every day (365 days a year)
<i>Spanish</i>				X
<i>Navajo</i>	X			
<i>Chinese (incl. Mandarin, Cantonese)</i>	X			
<i>Vietnamese</i>	X			
<i>Arabic</i>	X			
<i>Somali</i>	X			

Additional Languages Spoken

<i>French</i>
<i>Korean</i>
<i>German</i>
<i>Tagalog</i>
<i>Swahili</i>

This information is updated annually⁹ through checking the following resources:

⁹ Data should be kept up-to-date, but this plan does not need to be updated for incremental data changes during the Plan's 3-year period.

Data Sources for Languages Spoken in Affected Community	Website link to Data Source
<i>U.S. Census Bureau</i>	https://data.census.gov/table/ACSST5Y2021.S1601?g=860XX00US85706
<i>Local public-school data</i>	https://www.azed.gov/accountability-research/data
<i>Local housing and/or other assistance service data</i>	https://www.tucsonaz.gov/Departments/Housing-and-Community-Development
<i>Consultation with Tribal Offices</i>	https://gotr.azgovernor.gov/gotr/tribes-arizona

Beneficiary Diversity

Demographic information is collected from airport customers, attendees at community meetings, and businesses seeking opportunities at the airport, through voluntary disclosures.

Description of Beneficiary Demographic Information Collection Methods

- Airport Customer Service Office conducts annual surveys of airport guests for customer satisfaction with airport concessions, restroom cleanliness, food offerings, and other elements and services. The survey includes a voluntary request for demographic information.*
- Participants at small business workshops, pre-bid meetings, and other public meetings are asked to complete an anonymous survey that includes demographic information.*
- Businesses that submit bids or offers are asked to complete an anonymous survey that includes demographic information, submitted through a data collection website.*

Staff and Advisory Board Diversity

Demographic information is collected from airport program employees and members of planning and advisory boards, through voluntary disclosures.

Description of Employee and Advisory Board Demographic Information Collection Methods

- *Employees are asked to submit voluntary confidential demographic information at time of hiring. Job applicants are asked to submit the same information when submitting their job application through the job application website.*
- *Every 3 years, the airport administration sends an email to all board members asking them to voluntarily and anonymously enter demographic information through an online survey.*

7. POTENTIAL OR KNOWN COMMUNITY IMPACTS

Projects or services receiving federal financial assistance have the potential to touch so many aspects of American life. Thus, in general, no TAA activity must have a discriminatory disparate impact on the basis of race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age. This means that policies or procedures that have a disparate impact would require a well-documented substantial legitimate nondiscriminatory justification, summarized below. Impacts to protected communities must be avoided or minimized to the extent possible. No project with a discriminatory impact on protected communities will be undertaken.¹⁰

The following airport facilities are already in use or under construction and expected to be in use within the next 3 years:

Existing Airport Facilities	Affected Community Impacted by Operation of the Facility
<i>TUS - Airfield Safety Enhancement Project</i>	<i>None</i>

The following airport facility projects (including all alternatives) are in construction or expected to be in construction within the next 3 years:

Airport Facility Construction Projects	Affected Community Impacted by Construction of Facility
<i>TUS - Airfield Safety Enhancement Project</i>	<i>None</i>
<i>TUS – Terminal Expansion Construction – FY '26</i>	<i>None</i>
<i>RYN – Construct New Air Traffic Control Tower – FY '26</i>	<i>None</i>

We have analyzed the above existing facilities and facility construction projects for disparate impacts on the basis of race, color, or national origin (including LEP) in Affected Communities. The following have disparate impacts:

¹⁰In order to carry out an alternative with a discriminatory impact, the airport sponsor must demonstrate that there was a substantial legitimate justification for the decision. The sponsor must also show that alternatives with less discriminatory impacts were meaningfully considered and rejected for legitimate reasons.

Facilities or Construction with Disparate Impacts	Affected Community Impacted	Impact Can Be Eliminated?
<i>TUS - Airfield Safety Enhancement Project</i>	<i>None</i>	<i>NA</i>
<i>TUS – Terminal Expansion Construction – FY '26</i>	<i>None</i>	<i>NA</i>
<i>RYN – Construct New Air Traffic Control Tower – FY '26</i>	<i>None</i>	<i>NA</i>

Justifications:

Facilities or Construction Projects	Justification
<i>TUS - Airfield Safety Enhancement Project</i>	<i>NA</i>
<i>TUS – Terminal Expansion Construction – FY '26</i>	<i>NA</i>
<i>RYN – Construct New Air Traffic Control Tower – FY '26</i>	<i>NA</i>

8. LIMITED ENGLISH PROFICIENCY (LEP)

Executive Order 13166

In creating a Language Assistance Plan, the TAA will consider the volume, proportion, or frequency of contact with LEP persons in determining the appropriate language assistance to provide.

In Community Statistics section, we identified the following languages spoken by LEP persons in Affected Communities:

Language
<i>Spanish</i>
<i>Navajo</i>
<i>Chinese (incl. Mandarin, Cantonese)</i>
<i>Vietnamese</i>
<i>Arabic</i>
<i>Somali</i>

TAA also collects data for languages spoken by airport guests.¹¹ Data sources include:

Data Sources for Languages Spoken by Airport Guests	Website link to Data Source
<i>Assistance requests (walkup) to airport staff in Terminal</i>	<i>N/A</i>
<i>Assistance requests to airport information desks</i>	<i>www.cyracominternational.com</i>
<i>Assistance requests to airport phones or emails</i>	<i>www.cyracominternational.com</i>

Based on the above data, the following additional languages have been identified as likely to be spoken by LEP airport guests:

Language
<i>French</i>
<i>Korean</i>
<i>German</i>
<i>Tagalog</i>
<i>Swahili</i>

¹¹We aim to provide appropriate language assistance services to every LEP person encountered. This includes instances when LEP statistical data for a particular language was not available beforehand, or the safe harbor threshold for written translation was not met.

The Title VI Coordinator will also actively engage with community educators, community groups, places of work, business groups, social groups, and the like to confirm that translation and interpretation services are accurate and effective. Additionally, the Title VI Coordinator will inform leadership and staff of the TAA of the responsibility to provide language access. We have made the following plans to provide translation services free of charge to ensure that individuals with LEP have access to the benefits of the airport:

Translation Services:

- All written notices contain a statement in the identified languages, when appropriate, of

how to receive translated written materials.

- The following vendors have been identified for written translations:

Translation Vendors	Languages
<i>Cyrcam International Inc.</i>	<i>All</i>

- Information regarding translation services can be obtained at:

Location for Translation Assistance	Languages
<i>Terminal Information Counters</i>	<i>All</i>
<i>Volunteer multi-lingual staff pool</i>	<i>Spanish</i>
<i>Terminal House Phones</i>	<i>All</i>

Interpretation Services:

- The following vendors have been identified for interpretation services:

Interpretation Vendors	Languages
<i>Cyrcam International Inc.</i>	<i>All</i>

- Information regarding interpretation services can be obtained at:

Location for Interpretation Assistance	Languages
<i>Terminal Information Counters</i>	<i>All</i>
<i>Volunteer multi-lingual staff pool</i>	<i>Spanish</i>
<i>Terminal House Phones</i>	<i>All</i>

Description of Interpretation Assistance Processes

- TAA Customer Service Office maintains a list of multilingual employees, the languages they speak, and their associated contact numbers. The list indicates whether each employee is proficient to provide interpretation and/or translation services. The list is updated annually in the Public Information Handbook and available on the TAA employee intranet. Generally, these employee volunteers are available to assist members of the public with verbal real-time interpretation, during normal business hours.*
- The airport contracts with Danitza Elias to provide on-demand telephone interpretation services to airport guests. When a request for an interpreter is received, the following process is used: Airport information desk staff use I-Speak cards to identify the language spoken by the airport guest and locate the most available nearby TAA staff to assist with the language spoken by the guest. If no staff can be found for the spoken language, staff contacts Danitza Elias and “parks” the request in the queue for the appropriate language.*

9. TRANSPORTATION

49 CFR Part 21 Appendix C (a)(1)(ix)

In the Community Statistics section of this plan, TAA identified the Affected Communities and provided demographic and related data for the community populations. The minority and disadvantaged community areas located within the Affected Communities are identified below. Other minority and disadvantaged community areas that are near the airport but not within Affected Communities are also identified below.

We have coordinated with Sun Tran, the regions public travel system, to encourage them to provide transit service access between the airport and these areas.

The following chart identifies existing and planned transit services connecting the airport employment centers with the identified minority and disadvantaged community areas.

Minority and/or Disadvantaged Community Areas	Transit Service	Planned or Existing
Sunnyside Neighborhood	Fixed-route buses	Existing
Sunnyside Neighborhood	Paratransit vans	Existing
Sunnyside Neighborhood	On Demand	Existing

10. MINORITY BUSINESSES

49 CFR Part 21 Appendix C(a)(1)(x)

Bids for airport concessions and other business opportunities are solicited from area minority and woman-owned businesses through the following methods:

Airport Business Opportunity	Minority Business Outreach Methods
<i>All RFQs, IFBs, Contract Announcements</i>	<i>Advertised on airport website, through all local chambers of commerce, local minority print media and general newspapers, trade journals, a professional services directory, DBE/SBE/ACDBE (minority and woman owned businesses) outreach email list</i>

Selections are in compliance with Title VI, Part 21, and related requirements. Information on the award process and documentation for specific bid decisions is kept with the TAA Procurement Department.

11. TRAINING

New employee orientation incorporates Title VI training. Topics include:

- Title VI and related laws prohibit discrimination on the basis of race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age
- Title VI complaints must be forwarded to the Coordinator
- Protections against retaliation for filing civil rights complaints or related actions
- Title VI notices must be displayed throughout the airport public facilities
- All contracts must include Title VI clauses
- Language interpretation and translation services
- Cultural and community relations sensitivity training
- Anti-harassment training

Refresher information will be provided annually.

12. COMPLIANCE REVIEWS, AUDITS, COMPLAINTS, LAWSUITS, AND OTHER INVESTIGATIONS

FAA Notification. The Coordinator will notify FAA of any pending investigations and reviews, including:

- Compliance reviews or audits concerning civil rights requirements¹²
- Complaints, lawsuits, or other investigations alleging noncompliance with civil rights requirements¹³

As discussed in the Title VI Complaints Section, Title VI complaints must be forwarded to FAA contacts within 15 days of receipt. For all other civil rights investigations, TAA must notify FAA contacts of any new investigations prior to grant execution.

At regular intervals, the Coordinator will provide FAA contacts with status updates for the investigations and reviews, until completed. For each existing investigation or review completed within 5 years of this plan, the Coordinator will also provide a statement about the outcome, unless previously provided.

13. TITLE VI COMPLAINTS

49 CFR 21.11; 49 CFR 21 Appendix C (b)(3); 28 42.406(d)

Scope: These procedures are for complaints of discrimination under Title VI and related laws (hereafter “Title VI Complaints.” In order to be a Title VI Complaint, the complaint must:

1. Allege discrimination on the basis of race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age or violations administrative requirements under Title VI or related laws.
2. Not only be for employment matters (See note 14)
3. Allege misconduct by the TAA, including airport employees, contractors, concessionaires, lessees, or tenants.
4. Concern an airport facility or actions by the TAA including airport employees, contractors, concessionaires, lessees, or tenants.

¹²Includes any Title VI, ADA, Sec. 504, Title VII/EEO, or other civil rights program compliance review or audit to be performed on the airport sponsor or any of its sub-recipients by any State, local or Federal agency.

¹³Includes allegations of discrimination based on race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age, whether because of actions of the airport sponsor itself, or its employees, contractors, or tenants. Includes noncompliance with related administrative requirements under civil rights laws.

¹⁴Complaints of employment discrimination must be addressed as required by EEOC and other applicable authorities with jurisdiction over employment matters. If an Airport sponsor employment activity is supported by FAA-provided financial assistance or it is alleged that the employment discrimination affects the broader airport program, complaints about that activity must also be reported to FAA.

Rights: Any person who believes that he or she has been subjected to discrimination on the basis of race, color, national origin (including LEP), sex (including sexual orientation and gender identity), creed, or age has the right to file a complaint with the TAA. Alternatively, they can file a formal complaint with an outside agency, such as the U.S. Departments of Justice or Transportation, or the Federal Aviation Administration (FAA), or seek other legal remedies.

Receipt of Complaint: The Coordinator will log in the Title VI or ADA/504 complaint and promptly send copies of the complaint to the TAA President/CEO, VP of Finance, Legal, Communications, and copy the Director of Programs and Regulatory Compliance.

Complaints must be filed within 180 days of the discriminatory event, must be in writing, and must be delivered to:

Bert Resimont
Title VI Coordinator
Tucson Airport Authority
7250 South Tucson Blvd., Suite 300
Tucson, AZ 85756
Phone: (520) 573-4892 or Email: bresimont@flytucson.com

Title VI Program – Revised 11/2023

If a complaint is initially made by phone, it must be supplemented with a written complaint before 180 days after the discriminatory event has passed. If a verbal complaint is received, the complainant should be given a copy of the Airport Discrimination Complaint Procedures and instructed to submit a written complaint. Accommodation will be provided upon request to individuals unable to file a written complaint due to a disability.

Initial Procedure: The Coordinator may meet with the complainant to clarify the issues, obtain additional information, and determine if informal resolution might be possible in lieu of an investigation. If successfully resolved, the Coordinator will issue a closure letter to the complainant, record the disposition in the complaints log, and report the resolution to FAA.

Discrimination Complaint Referral Procedure

Internal Complaint Referral: All Title VI complaints must be promptly forwarded to the Coordinator within 24 hours.

Initial FAA Notification A copy of each Title VI complaint will be forwarded to the FAA within 15 days of initial receipt (not the date that the Coordinator was notified). The Coordinator will forward a copy of the complaint and a statement describing all actions taken to resolve the matter, and the results thereof to the FAA Civil Rights staff. (Note: complaints based on disability do not have to be forwarded to FAA.) To transmit complaint information to the FAA, the Coordinator will upload the documented complaint to the FAA Civil Rights Connect System. The Coordinator will also seek technical assistance from FAA, as needed, throughout complaint intake, investigation and resolution process.

Investigation Procedure

Assignment of Investigator: The Coordinator will immediately begin the investigation or designate an investigator.

Cooperation with FAA: The Coordinator will promptly investigate all Title VI complaints, including those referred by the FAA for investigation. If the FAA is investigating a complaint against TAA, the Coordinator will avoid interfering with the FAA investigation, cooperate with the FAA when needed, and share factual information with the FAA.

Prompt Investigation: The Coordinator will make every effort to complete discrimination complaint investigations within 60 calendar days after the complaint is received. Some investigations may take longer with a justification for the delay and assurance that the investigation is being completed as quickly as possible.

Contact with Complainant: The Coordinator will meet with the complainant to clarify the issues and obtain additional information, and also speak with community members and potential witnesses, as appropriate.

Investigation Report: After completing the investigation, the Coordinator will prepare a written report.

Consultation with Legal Counsel: In each case, the Coordinator will consult with Legal Counsel
Title VI Program – Revised 11/2023

regarding the investigation and the report. Airport Legal Counsel will ensure that the report is consistent with the DOT and FAA Title VI nondiscrimination requirements.

Prompt Resolution of Disputes: The Coordinator will emphasize voluntary compliance and quickly and fairly resolve disputes with complainants, or with contractors, tenants, or other persons, through dispute resolution with the TAA Legal department.

Forwarding Report and Response to Complainant: At the completion of the investigation, the complainant and respondent will receive a letter of findings and determination of the investigation and any applicable resolution. The letter transmitting the findings and any applicable resolution will state TAA's conclusion regarding whether unlawful discrimination occurred, and will describe the complainant's appeal rights. A summary of the investigation report, any appeal, or follow-up actions will be sent to the FAA via the FAA Civil Rights Connect System.

Appeal Rights: The complainant must be notified of their right to appeal the findings or determinations, and of the procedures and requirements for an appeal:

- ❖ The complainant may appeal in writing to the TAA's President/CEO.
- ❖ The written appeal must be received within 14 business days after receipt of the written decision.
- ❖ The written appeal must contain all arguments, evidence, and documents supporting the basis for the appeal.
- ❖ The TAA President/CEO will issue a final written decision in response to the appeal.

Avoiding Future Discrimination: In addition to taking action with respect to any specific instances of discrimination, the TAA will identify and implement measures to reduce the chances of similar discrimination in the future.

Intimidation and Retaliation Prohibited: TAA employees, contractors, and tenants will not intimidate or retaliate against a person who has filed a complaint alleging discrimination.

For information on filing a complaint with DOT/FAA, please contact Bert Resimont, Title VI Coordinator, at 520-573-4892 or bresimont@flytucson.com.

This complaint procedure is shared with the public through the following methods:

Website, In-person, and Other Distribution Methods

1 Airport website, Title VI page at www.flytucson.com/taa/nondiscrimination-policies/

2 In-person upon request at the airport via the Title VI Coordinator

3 By phone or email upon request via the Title VI Coordinator

14. POPULATION/LANGUAGE DATA

B16001 Table for Airport Zip Code 85756

LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER



Note: This is a modified view of the original table produced by the U.S. Census Bureau. This download or printed version may have missing information from the original table.

ZCTA5 85756		
Label	Estimate	Margin of Error
▼ Total:	35,368	±1,393
Speak only English	18,215	±1,146
▼ Spanish or Spanish Creole:	16,129	±1,297
Speak English "very well"	11,075	±1,197
Speak English less than "very well"	5,054	±592
▼ French (incl. Patois, Cajun):	63	±66
Speak English "very well"	63	±66
Speak English less than "very well"	0	±26
▼ French Creole:	9	±18
Speak English "very well"	9	±18
Speak English less than "very well"	0	±26
▼ Italian:	15	±28
Speak English "very well"	15	±28
Speak English less than "very well"	0	±26
▼ Portuguese or Portuguese Creole:	10	±18
Speak English "very well"	10	±18
Speak English less than "very well"	0	±26
▼ German:	56	±81
Speak English "very well"	56	±81
Speak English less than "very well"	0	±26
▼ Yiddish:	0	±26
Speak English "very well"	0	±26
Speak English less than "very well"	0	±26
▼ Other West Germanic languages:	7	±13
Speak English "very well"	7	±13
Speak English less than "very well"	0	±26
▼ Scandinavian languages:	0	±26
Speak English "very well"	0	±26
Speak English less than "very well"	0	±26
▼ Greek:	16	±26
Speak English "very well"	16	±26
Speak English less than "very well"	0	±26
▼ Russian:	10	±18
Speak English "very well"	10	±18
Speak English less than "very well"	0	±26
▼ Polish:	0	±26
Speak English "very well"	0	±26
Speak English less than "very well"	0	±26
▼ Serbo-Croatian:	22	±36
Speak English "very well"	22	±36
Speak English less than "very well"	0	±26
▼ Other Slavic languages:	0	±26
Speak English "very well"	0	±26
Speak English less than "very well"	0	±26

S1701 Table for Airport Zip Code of 85756

ZCTA5 85756							
Total		Below poverty level		Percent below poverty level			
Label	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	
Population for whom poverty status is determined	34,010	±2,264	4,240	±845	12.5%	±2.6	
AGE							
Under 18 years	9,519	±1,252	1,630	±444	17.1%	±5.4	
Under 5 years	2,280	±436	471	±183	20.7%	±7.8	
5 to 17 years	7,239	±1,258	1,159	±321	16.0%	±5.6	
Related children of householder under 18 years	9,496	±1,253	1,607	±444	16.9%	±5.3	
18 to 64 years	19,915	±1,525	2,128	±459	10.7%	±2.3	
18 to 34 years	7,877	±724	1,135	±339	14.4%	±3.9	
35 to 64 years	12,038	±1,294	993	±253	8.2%	±2.2	
65 years and over	5,745	±476	597	±225	10.4%	±3.8	
65 years and over	4,576	±418	482	±215	10.5%	±4.5	
SEX							
Male	17,163	±1,424	1,771	±446	10.3%	±2.6	
Female	16,847	±1,324	2,469	±542	14.7%	±3.3	
RACE AND HISPANIC OR LATINO ORIGIN							
White alone	19,832	±1,489	2,409	±734	12.1%	±3.4	
Black or African American alone	2,100	±662	197	±185	9.4%	±3.2	
American Indian and Alaska Native alone	1,437	±525	251	±167	17.5%	±11.8	
Asian alone	384	±165	5	±8	1.3%	±2.4	
Native Hawaiian and Other Pacific Islander alone	0	±28	0	±28	-	**	
Some other race alone	4,775	±961	753	±424	15.8%	±8.0	
Two or more races	5,482	±2,031	625	±270	11.4%	±5.8	
Hispanic or Latino origin (of any race)	21,535	±2,256	3,672	±831	17.1%	±4.2	
White alone, not Hispanic or Latino	9,071	±1,026	306	±114	3.4%	±1.4	
EDUCATIONAL ATTAINMENT							
Population 25 years and over	21,049	±1,311	1,900	±408	9.0%	±2.0	
Less than high school graduate	4,147	±557	870	±286	21.0%	±6.2	
High school graduate (includes equivalency)	5,419	±643	477	±139	8.8%	±2.6	
Some college, associate's degree	7,509	±1,029	420	±127	5.6%	±1.9	
Bachelor's degree or higher	3,974	±529	133	±94	3.3%	±2.3	
EMPLOYMENT STATUS							
Civilian labor force 16 years and over	15,838	±1,296	1,225	±262	7.7%	±1.8	
Employed	14,459	±1,082	1,068	±251	7.4%	±1.8	
Male	7,768	±744	365	±165	4.7%	±2.1	
Female	6,691	±707	703	±177	10.5%	±3.8	
Unemployed	1,379	±691	157	±90	11.4%	±3.5	
Male	928	±664	73	±63	7.9%	±10.7	
Female	451	±172	84	±66	18.6%	±12.8	
WORK EXPERIENCE							
Population 16 years and over	25,414	±1,520	2,735	±549	10.8%	±2.1	
Worked full-time, year-round in the past 12 months	10,816	±956	470	±134	4.3%	±1.3	
Worked part-time or part-year in the past 12 months	5,829	±747	814	±242	14.0%	±4.0	
Did not work	8,769	±846	1,451	±378	16.5%	±4.1	
ALL INDIVIDUALS WITH INCOME BELOW THE FOLLOWING PERCENT OF POVERTY LEVEL							
50 percent of poverty level	1,578	±456	(X)	(X)	(X)	(X)	
125 percent of poverty level	5,976	±1,170	(X)	(X)	(X)	(X)	
150 percent of poverty level	7,889	±1,219	(X)	(X)	(X)	(X)	
185 percent of poverty level	10,439	±1,301	(X)	(X)	(X)	(X)	
200 percent of poverty level	11,713	±1,288	(X)	(X)	(X)	(X)	
300 percent of poverty level	20,191	±2,179	(X)	(X)	(X)	(X)	
400 percent of poverty level	25,658	±2,138	(X)	(X)	(X)	(X)	
500 percent of poverty level	28,946	±2,423	(X)	(X)	(X)	(X)	
UNRELATED INDIVIDUALS FOR WHOM POVERTY STATUS IS DETERMINED	4,082	±566	806	±283	22.0%	±5.8	
Male	2,216	±369	364	±156	16.4%	±6.1	
Female	1,866	±356	532	±257	28.5%	±10.9	
15 years	0	±28	0	±28	-	**	
16 to 17 years	23	±27	23	±27	100.0%	±68.6	
18 to 24 years	609	±331	374	±270	61.4%	±19.1	
25 to 34 years	604	±260	50	±40	5.7%	±4.6	
35 to 44 years	416	±168	104	±69	25.0%	±14.3	

15. COMPLETED UNLAWFUL DISCRIMINATION POSTER

Unlawful Discrimination

It is unlawful for airport operators and their lessees, tenants, concessionaires and contractors to discriminate against any person because of race, color, national origin, sex, creed, or disability in public services and employment opportunities. Allegations of discrimination should be promptly reported to the Airport Manager or:

Federal Aviation Administration
Office of Civil Rights, ACR-1
800 Independence Avenue, S.W.
Washington, D.C. 20591

Federal regulations on unlawful discrimination are available for review in the Airport Manager's Office.

Coordinator: (ADA) Bert Resimont (504) Aaron Duckworth
Phone: ADA (520) 573-4892 (504 Coordinator) 520-573-8193
Address: 7250 S. Tucson Blvd., Suite 300
Tucson, AZ 85756

Emails: (ADA) Bresimont@flytucson.com (504) aduckworth@flytucson.com

Discriminacion Ilegal

Se prohíbe a los operadores de aeropuertos y a sus arrendatarios, inquilinos, concesionarios y contratistas discriminar contra cualquier persona por motivo de raza, color, nacionalidad de origen, sexo, creencias religiosas, impedimento físico o discapacidad en lo que respecta a servicios públicos y oportunidades de empleo. Las alegaciones de discriminación deberán ser dirigidas inmediatamente al Administrador del Aeropuerto o a:

Federal Aviation Administration
Office of Civil Rights, ACR-1
800 Independence Avenue, S.W.
Washington, D.C. 20591

Los reglamentos sobre discriminación ilegal están a la disposición de los interesados para su examen en la oficina del Administrador del Aeropuerto.

Coordinador: (ADA) Bert Resimont (504) Aaron Duckworth
Teléfono: ADA (520) 573-4892 (504 Coordinator) 520-573-8193
Dirección: 7250 S. Tucson Blvd., Suite 300
Tucson, AZ 85756

Emails: (ADA) Bresimont@flytucson.com (504) aduckworth@flytucson.com



U.S. Department of Transportation
Federal Aviation Administration

HO-101098

Bert Resimont

From: FAA Civil Rights Connect <faa@civilrightsconnect.com>
Sent: Wednesday, December 13, 2023 8:41 AM
To: Bert Resimont
Subject: FAA: TUS Title VI Plan Approved

You don't often get email from faa@civilrightsconnect.com. [Learn why this is important](#)

FAA Civil Rights Connect

TUS Title VI Plan Approved

The Title VI Plan for **TUCSON INTERNATIONAL** has been **Approved** by Melissa Wu.

FAA Civil Rights Connect System

Web Access: <https://FAA.CivilRightsConnect.com/>

Customer Support: <https://FAA.CivilRightsConnect.com/FAA/RequestSupport.asp>