



October 28, 2022

Secretary Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, D.C. 20590

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Ramiro A. Cavazos
President & CEO

Re: Public Comment for Department of Transportation (DOT-OST-2022-0051-0001)

Dear Secretary Buttigieg,

The United States Hispanic Chamber of Commerce (USHCC) was founded in 1979 and works to actively promote the economic growth, development, and interests of more than five million Hispanic-owned businesses. We exist to support these businesses that contribute over \$800 billion to the American economy each year. We operate through a network of more than 260 local chambers and business associations throughout the nation and have partnerships with more than 200 major global corporations.

We are grateful for the opportunity to submit comments to strengthen the implementation of the Department of Transportation's (DOT) Disadvantaged Business Enterprise (DBE) and Airport Concession Disadvantaged Business Enterprise (ACDBE) Program regulations.

On DOT DBE State Reciprocity

- 8(a) companies should qualify for DBE status at the state level without having to complete the onerous and often duplicative process.
- New entrants into the DBE program shouldn't have to go through the exhausting certification process if they have already qualified at the federal level.
- It shouldn't be mandatory, as that would trigger separation of powers concerns; however, different states should be afforded every opportunity to "voluntarily" waive the process for federal 8(a) firms.

We believe that the duplicative process is a great obstacle for smaller firms who do not have the bandwidth to navigate the current bureaucracy. By streamlining this process, the federal marketplace will become accessible to new firms who are ready and able to work but have historically been left out due to accessibility issues. We are firm believers that limiting supplier diversity, as well as supply chain options for our government is not only unfair, but inefficient as well. If more businesses can compete for these contracts, the whole country will benefit from higher levels of innovation and an overall better value on return for our taxes.

Thank you for your service and partnership in supporting our Hispanic and minority-owned businesses across the country. If you have any questions, please do not hesitate to reach out to C. LeRoy Cavazos-Reyna, Vice President of Government and International Affairs of the USHCC, via phone at 956-844-9628 or email at LCavazos@ushcc.com. We commend you for your leadership and look forward to a positive outcome on this important matter.

Respectfully,

A handwritten signature in blue ink that reads "Ramiro Cavazos".

Ramiro A. Cavazos
President & CEO
United States Hispanic Chamber of Commerce