



INDIANA DEPARTMENT OF TRANSPORTATION

Driving Indiana's Economic Growth

100 North Senate Avenue
Room N901
Indianapolis, Indiana 46204

PHONE: (317) 232-5292
FAX: (317) 232-1499

Mitchell E. Daniels, Jr., Governor
Michael B. Cline, Commissioner

May 9, 2012

Ms. Antoinette Davis
Federal Transit Administration
200 West Adams Street, Suite 320
Chicago, IL 60606

RE: Updated Methodology and Goal

Dear Ms. Davis:

Please accept this letter in response to the concerns raised in your March 9, 2012 correspondence regarding the Disadvantaged Business Enterprise (DBE) goal setting methodology submitted by the Indiana Department of Transportation, Office of Transit (INDOT). Our response is organized pursuant to the concerns identified on the DBE Goal Setting Methodology Requirements checklist attached to your letter, which is reproduced in bold for your convenience and ease of reference. In addition, our responses below have been incorporated into our updated DBE goal. A copy of our updated DBE goal and methodology is attached (Attachment #1).

SUBMISSION

Proof of publication

- **Please provide a copy of the affidavit or publication of your goal.**

INDOT failed to publish our goal prior to our original submittal; however, the updated goal has been submitted to twenty-eight (28) newspapers around the State of Indiana for publication. A copy of our advertisement, letter to the newspapers requesting publication and the list of newspapers where our goal will be published is attached (Attachment #2).

METHODOLOGY

Uses all correct/appropriate NAICS codes

- **Please include all NAICS codes for all contracting opportunities. After you have identified the proper NAICS codes, you should use your state UCP and locate those ready, able, and willing DBEs.**

Currently, there are forty-three (43) ready, willing and able DBE firms capable of performing work on INDOT Transit contracts. Below is a complete list of all NAICS codes, with the corresponding project descriptions, available for DBEs on INDOT Transit contracts.

<u>Project Description</u>	<u>NAICS Codes</u>	<u>UCP Firms</u>
Office supplies and Equipment	424120	2
Office Furniture	423210	1
Computer Equipment & Accessories	423430	2
Insurance	524126	1
Janitorial Service	561720	11
Janitorial Supplies & Equipment	423850	4
Automotive and Vehicle Servicing	423120	3
Transit Automotive Tires	441300	0
Purchase Transportation	485320	0
Advertising & Marketing Services	541810	12
Printing and Binding	323117	2
Legal Services	541110	1
Consulting Services	541610	<u>4</u>
Total Number of Firms		43

Development of Base Figure

➤ Step 1 - Base Figure 49 CFR 26.45 (c)

To arrive at its Base Figure, INDOT used the most relevant and reliable data available to provide demonstratable evidence of those DBEs ready, willing, and able to perform work as a DBE in the thirteen (13) work types identified for Transit contracts relative to all firms in the market area. For the purposes of determining the DBE goal for Transit contracts, INDOT's Geographic Market Area is considered to be the State of Indiana. INDOT used the DBE Directories and Census Bureau Data as the data source for its base figure. INDOT used the Census Bureau's County Business Pattern (CBP) data base to determine the number of all ready, willing, and able businesses available in our market that perform the work in the same NAICS codes as there are contracting opportunities on INDOT Transit contracts. According to our review of the most current data on the CBP:

- There are 146,017 businesses in Indiana. Of the 146,017 businesses in Indiana, 65,304 are ready, willing and able to perform work in the NAICS codes mentioned above. (<http://www.census.gov/epcd/cbp/view.html>)
- There are 51,106 minority owned businesses in Indiana. (<http://www.census.gov>)
- According to Indiana's UCP directory, there are 582 certified DBEs in Indiana. (<http://www.in.gov/indot/2392.htm>)
- Of the 582 certified DBEs in Indiana, 539 were excluded from our ready, willing and able list because the DBEs were not certified in the thirteen (13) NAICS codes mentioned previously;

leaving 43 ready, willing and able DBE firms capable of performing on INDOT Transit contracts.

The tables provided below detail the base figure calculation:

Ratio of Minority Businesses to Market Businesses			
Minority Businesses	51,106	=	35.0%
Market Businesses	146,017		

Ratio of Ready, Willing and Able Businesses to Certified DBE's			
Ready, willing, and able DBEs	43	=	7.4%
Certified DBEs	582		

Ratio of Ready, Willing and Able DBE Businesses multiplied by Ready, Willing and Able Market			
Base Figure (7.4%) X Ready, Willing and Able Market (65,304)	7.4%	X	65,304 = 4832

Ratio of Ready, Willing and Able DBE to Ready, Willing and Able Market			
Ready, willing and able DBE's	43	=	0.89%
Ready, willing, and able Market Businesses	4832		

The base figure estimate of DBE availability is 0.89%.

➤ Step 1 - Weighting

The availability of ready, willing and able DBEs is 0.89 percent or less than one percent (1.00%) of the ready, willing and able Market. DBE participation over the past three (3) years (as illustrated below) is well under one percent (1.00%), with the exception of calendar year (CY) 2009, where a Rural Technical Assistance Program (RTAP) contract was awarded to a DBE firm over a period of four (4) years for over \$1.7 million dollars. These types of contracts are rare and greatly skew the total DBE participation percentage and potential contracting opportunities for DBEs; therefore, this contract should not be considered in the final determination of INDOT's DBE goal calculation.

The chart below illustrates the DBE contracting opportunities and DBE achievements for 2009, 2010, and 2011. After all federal exemptions, INDOT only has a small dollar amount of contracting opportunities available to DBEs. INDOT requires all rural transit systems to complete a DBE worksheet that details all of its contracting opportunities, based on INDOT's fund distribution; DBE utilization, including reasons for not utilizing a DBE; and total dollar amount paid to DBEs. INDOT

collects this information quarterly from each system. A copy of a sample DBE worksheet is attached (Attachment #3).

DBE Participation Data Based on data collection from CY 2009 - 2011				
CY	DBE Contracting Opportunities**	Total DBE Achieved in Dollars	Total DBE percent	Round to next whole %
2009*	\$1,991,741	\$1,726,701	86.69%	87%
2009	\$266,103	\$1,063	0.3995%	1%
2010	\$327,074	\$2,089	0.6387%	1%
2011	\$435,499	\$2,233	0.5127%	1%

*Includes RTAP contract for \$1,725,638. The RTAP contract was awarded to a DBE firm with a 4 year disbursement.

**This is the money INDOT provides to transit systems after all federal exemptions.

Based on past participation totals, an adjustment of rounding the base figure of .89% to the nearest whole number or one percent (1.00%) is warranted; any adjustment greater is not warranted, given the limited contracting opportunities available in our market.

Race-Conscious / Race Neutral Breakdown

Projection of Race-Neutral vs. Race-Conscious Goal Attainment

In accordance with 49 CFR 26.45(f)(3), INDOT will meet the maximum feasible portion of its overall goal of one percent (1.00%) through race-neutral means. INDOT's race neutral initiatives are designed to:

1. Create a level playing field on which DBEs can compete fairly for USDOT-assisted contracts;
2. Assist the development of DBE firms so they can compete successfully in the market place outside the DBE Program; and
3. Ensure that INDOT's DBE Program is narrowly tailored in accordance with applicable law.

Race-Neutral Initiatives

INDOT provides business development training for its certified and potential DBE firms in many ways. First, INDOT staff provides ongoing support and technical assistance to DBE firms throughout the year. In addition to on-demand phone and email support, INDOT provides DBE firms with information, as well as access to INDOT's DBE email listserv. Second, INDOT provides assistance to DBE firms through its Supportive Services Section. The Supportive Services Manager surveys DBE firms annually to determine common concerns, barriers to entry, and specific requests as the bases for specific program development targets. Then, through the financial support of USDOT, INDOT works with its professional consultant to create effective, relevant, and customer-driven DBE development programs.

Past Median Race-Neutral Participation

INDOT will meet its DBE goal of one percent (1.00%) through race-neutral measures solely. INDOT does not let contracts for the rural transit systems. The rural transit systems let and award all contracts regardless of contract type themselves. Based on past history, most if not all of the contracting opportunities for transit is through the procurement process. The systems do not set DBE goals for contracts; therefore, all DBE participation is by race-neutral measures. The data provided in the Step 1 analysis detailing DBE past participation was all obtained by race-neutral measures. INDOT will strive to encourage all rural transit systems to continue to find additional opportunities for DBEs when contracting opportunities arise to achieve of DBE goal.

Should you need additional information from INDOT regarding the Office of Transit DBE goal, please contact me at (317) 232-5292.

Sincerely,



Larry Buckel
Manager
Office of Transit

INDIANA DEPARTMENT OF TRANSPORTATION
MULTI-MODAL
DISADVANTAGED BUSINESS ENTERPRISE PROGRAM
FOR
FEDERAL TRANSIT ADMINISTRATION
FISCAL YEAR 2012

History of Program

Historically, the Indiana Department of Transportation (INDOT) Disadvantaged Business Enterprise (DBE) Goal for the Federal Transit Administration (FTA) Funding recipients has been incorporated and accepted as part of the overall INDOT DBE Program Goal; however, this has not been the case for several years now. INDOT determined that for several possible reasons, the type of historical and analytical data required to establish a specific DBE goal, based on demonstrable evidence of the availability of ready, willing, and able DBEs for the FTA Program, is not available.

We have determined that prior to the implementation of a Unified Certification Program (UCP) in 2005, many of the business that may have been utilized as DBEs, may not have been certified as a DBE, in accordance with 49 CFR 26. They may, however, have been owned and operated by individuals who may qualify for DBE status. Many may also have been certified as Minority (MBE) and/or Women (WBE) Business Enterprises under State and/or Local programs.

Participants and Basis for Overall Goal

The larger more urban recipients of FTA federal-aid funding are not incorporated into this DBE Goal Submission. It is the responsibility of these recipients to submit their DBE Goal directly to the FTA for approval. These recipients receive Section 5307 funds directly from the FTA. INDOT is responsible for calculating a DBE goal for FTA funds administered directly by INDOT.

A review of the budgetary operating expenses determined that there are thirteen (13) potential transit-related contracting opportunities, sorted by the North American Industry Classification System (NAICS) Codes: #424120 – Office supplies and equipment; #423210 – Office furniture; #423430 - Computer equipment and accessories; #524126 – Insurance; #561720 – Janitorial service; #423850 – Janitorial supplies and equipment; #423120 – Automotive and vehicle servicing; #441300 – Transit automotive tires; #485320 – Purchase transportation; #541810 – Advertising and marketing services; #323117 – Printing and binding; #541110 – Legal services; and #541610 – Consulting services. Currently, there are forty-three (43) ready, willing and able firms certified as a DBE in Indiana capable of performing work under these NAICS codes.

Vehicle procurement is not included in the goal calculation because of FTA regulations. INDOT procures all vehicles for our sub-grantees and follows FTA regulations.

Although there are currently no funds budgeted for design and construction projects, should funds be budgeted for such, the transit system shall administer the project in accordance with the procedures outlined in the approved INDOT DBE Program Manual for FTA projects, unless the System desires to develop its own DBE Program Manual in accordance with 49 CFR 26 and submit it to FTA for approval.

Proposed Methodology (Except for Design and Construction Projects)

Step 1: Base Figure 49 CFR 26.45 (c): Market Capacity for Ready, Willing and Able Businesses

To arrive at its Base Figure, INDOT used the most relevant and reliable data available to provide demonstrable evidence of those DBEs ready, willing, and able to perform work as a DBE in the thirteen (13) work types identified for Transit contracts relative to all firms in the market area. For the purposes of determining the DBE goal for Transit contracts, INDOT's Geographic Market Area is considered to be the State of Indiana. INDOT used the DBE Directories and Census Bureau Data as the data source for its base figure. INDOT used the Census Bureau's County Business Pattern (CBP) data base to determine the number of all ready, willing, and able businesses available in our market that perform the work in the same NAICS codes as there are contracting opportunities on INDOT Transit contracts. According to our review of the most current data on the CBP:

- There are 146,017 businesses in Indiana. Of the 146,017 businesses in Indiana, 65,304 are ready, willing and able to perform work in the NAICS codes mentioned above. (<http://www.census.gov/epcd/cbp/view.html>)
- There are 51,106 minority owned businesses in Indiana. (<http://www.census.gov>)
- According to Indiana's Unified Certification Program (UCP) directory, there are 582 certified DBEs in Indiana. (<http://www.in.gov/indot/2392.htm>)
- Of the 582 certified DBEs in Indiana, 539 were excluded from our RWA list because the DBEs were not certified in the thirteen (13) NAICS codes mentioned previously; leaving 43 RWA DBE firms capable of performing on INDOT Transit contracts.

The tables provided below detail the base figure calculation:

Ratio of Minority Businesses to Market Businesses			
Minority Businesses	51,106	=	35.0%
Market Businesses	<u>146,017</u>		

Ratio of Ready, Willing and Able Businesses to Certified DBE's			
Ready, willing and able DBEs	43	=	7.4%
Certified DBEs	<u>582</u>		

Ratio of Ready, Willing and Able DBE Businesses multiplied by Ready, Willing and Able Market			
Base Figure (7.4%) X Ready, willing and able Market (65,304)	7.4%	X	65,304 = 4832

Ratio of Ready, Willing and Able DBE to Ready, Willing and Able Market			
Ready, willing and able DBEs	43	=	0.89%
Ready, willing and able Market Businesses	<u>4832</u>		

The base figure estimate of DBE availability is 0.89%.

The availability of ready, willing and able DBEs is 0.89 percent or less than one percent (1.00%) of the ready, willing and able Market. DBE participation over the past three (3) years (as illustrated below) is well under one percent (1.00%), with the exception of calendar year (CY) 2009, where a Rural Technical Assistance Program (RTAP) contract was awarded to a DBE firm over a period of four (4) years for over \$1.7 million dollars. These types of contracts are rare and greatly skew the total DBE participation percentage and potential contracting opportunities for DBEs; therefore, this contract should not be considered in the final determination of INDOT's DBE goal calculation.

The chart below illustrates the DBE contracting opportunities and DBE achievements for 2009, 2010, and 2011. After all federal exemptions, INDOT only has a small dollar amount of contracting opportunities available to DBEs. INDOT requires all rural transit systems to complete a DBE worksheet that details all of its contracting opportunities, based on INDOT's fund distribution; DBE utilization, including reasons for not utilizing a DBE; and total dollar amount paid to DBEs. INDOT collects this information quarterly from each system.

DBE Participation Data Based on data collection from CY 2009 - 2011				
	DBE Contracting Opportunities**	Total DBE Achieved in Dollars	Total DBE percent	Round to next whole %
CY				
2009*	\$1,991,741	\$1,726,701	86.69%	87%
2009	\$266,103	\$1,063	0.3995%	1%
2010	\$327,074	\$2,089	0.6387%	1%
2011	\$435,499	\$2,233	0.5127%	1%
*Includes RTAP contract for \$1,725,638. The RTAP contract was awarded to a DBE firm with a 4 year disbursement.				
**This is the money INDOT provides to transit systems after all federal exemptions.				

Based on past participation totals, an adjustment of rounding the base figure of 0.89% to the nearest whole number or one percent (1.00%) is warranted; any adjustment greater is not warranted, given the limited contracting opportunities available in our market.

Step 2 - Adjustments

An adjustment, rounding the Capacity Availability of 0.89% to the next highest whole percent of one percent (1.00%) was made with the following justifications:

- The ratio of Minority Business of the Market is over 15%.
- Over 51,000 Minority Businesses exist in Indiana and some maybe eligible but have not applied for DBE certification.
- There are a number of businesses certified as Minority or Women Business Enterprises that are or may be applying for DBE certification.

The UCP likely will validate more DBEs, including those that were not certified, but utilized by transit systems.

Race-Conscious / Race Neutral Breakdown

Projection of Race-Neutral vs. Race-Conscious Goal Attainment

In accordance with 49 CFR 26.45(f)(3), INDOT will meet the maximum feasible portion of its overall goal of one percent (1.00%) DBE goal for transit contracts through race-neutral means. INDOT's race neutral initiatives are designed to:

1. Create a level playing field on which DBEs can compete fairly for USDOT-assisted contracts;
2. Assist the development of DBE firms so they can compete successfully in the market place outside the DBE Program; and
3. Ensure that INDOT's DBE Program is narrowly tailored in accordance with applicable law.

Race-Neutral Initiatives

INDOT provides business development training for its certified and potential DBE firms in many ways. First, INDOT staff provides ongoing support and technical assistance to DBE firms throughout the year. In addition to on-demand phone and email support, INDOT provides DBE firms with information, as well as access to INDOT's DBE email listserv. Second, INDOT provides assistance to DBE firms through its Supportive Services Section. The Supportive Services Manager surveys DBE firms annually to determine common concerns, barriers to entry, and specific requests as the bases for specific program development targets. Then, through the financial support of USDOT, INDOT works with its professional consultant to create effective, relevant, and customer-driven DBE development programs.

Past Median Race-Neutral Participation

INDOT will meet its DBE goal of one percent (1.00%) through race-neutral measures solely. INDOT does not let contracts for the rural transit systems. The rural transit systems let and award all contracts regardless of contract type themselves. Based on past history, most if not all of the contracting opportunities for transit is through the procurement process. Most transit systems do not typically set DBE goals for contracts; therefore, most if not all DBE participation is by race-neutral measures. INDOT will strive to encourage all rural transit systems to continue to find additional opportunities for DBEs when contracting opportunities arise to achieve of DBE goal.

Program Enhancement Procedures

The appropriate statistical data required to establish a viable DBE goal that is based on ready, willing, and able certified DBEs, is currently not available. In order to accrue applicable data, INDOT has developed and implemented specific requirements and reporting procedures. These requirements and procedures include,

Utilization of Certified DBEs

All transit systems will be required to develop and implement procedures that ensure that solicitation of DBEs will be from the Directory published by the Indiana Department of Transportation – Economic Opportunity Division. INDOT is the official certifying agent for the State of Indiana. This directory lists the firm's name, address, phone number and the type of work the firm has been certified to perform as a DBE. This directory is updated at least monthly and is available via the internet at <http://www.in.gov/indot/2392.htm>.

Required Contract Clauses

All transit systems will be required to ensure that applicable clauses are incorporated into each DOT-Assisted contractual agreement regardless of tier.

- **Non-Discrimination** – The contractor, subcontractor or firm shall not discriminate on the basis of race, color, national origin, or sex in the performance of this contract. The contractor shall carry out applicable requirements of 49 CFR 26 in the award and administration of the DOT-Assisted Contracts. Failure by the contractor to carry out these requirements in a material breach of this contract, which may result in the termination of this contract or such other remedy as the recipient deems appropriate.
- **Prompt Payment** – A clause, appropriate for the type of agreement and work being performed shall be incorporated into each DOT –Assisted prime contractual agreement, addressing the prompt payment of lower tier participants within ten (10) business days after completion of work or receipt of payment, as appropriate.

Compliance Assurance of Transit Vehicle Manufacturer

All transit systems will be required to implement procedures that ensure, when purchasing transit vehicles, that the transit vehicle manufacture is in compliance with 49 CFR 26 and is authorized to bid or propose on FTA-Assisted transit vehicle procurements. INDOT's Public Transit Section shall maintain documentation of manufacturer's compliance.

Achievement of DBE Goal

The established DBE Goal is an annual goal. The transit system may elect to set goals in a specific expenditure area by setting Race/Gender-Conscious goals or achieve its goal solely through Race/Gender-Neutral procedures. INDOT shall evaluate the goal achievement after six (6) months. If goal attainment is low at evaluation, remedial adjustments shall be considered and documented.

Good Faith Efforts

All transit systems must establish "Good Faith Efforts" procedures that are affirmative in nature, disseminated to all appropriate individuals and/or participants and are fully documented. Attainment of the DBE goal is evidence of Good Faith Efforts; however, failure to meet or exceed the goal shall require justification and evaluation.

Record Keeping and Reporting

All transit systems shall develop a system that documents and maintains records of DBE utilization and payments to DBEs. Payments may be documented through an affidavit signed by the (payer and payee) indicating separately, the amount paid and the amount received. The transit systems shall report DBE utilization to INDOT on a quarterly basis, on DBE Utilization forms provided by INDOT.

Public Involvement

Public Comments

Pursuant to 49 CFR 26.45(g)(2), INDOT will announce its FFY 2012 proposed overall goal and rationale through public notice starting on or about May 9, 2012 and will make it available for inspection during normal business hours at its principal office for thirty (30) days following the date of the first notice. INDOT will accept public comments for forty-five (45) days from the date of the first notice, with its comment period ending on June 22, 2012.

INDOT will re-advertise the appropriate 2012 DBE Goal if amended, upon approval by the FTA. INDOT will notify certified DBE firms directly of the 2012 DBE Goal subsequent to its approval.

Advertisements

INDOT will advertise its FFY 2012 DBE Goal Legal Notice in the following Newspapers:

*

Our Times
Classified Department
P.O. Box 2164
Evansville, IN 47728

*

Frost Illustrated
Classified Department
3121 S. Calhoun
Fort Wayne, IN 46807

Palladium Item
Classified Department
P.O. Box 308
Richmond, IN 47375

Indianapolis Commercial
Classified Department
41 E. Washington, Suite 200
Indianapolis, IN 46204

The Times
Classified Department
602 West 45th Ave.
Munster, IN 46321

Herald Bulletin
Classified Department
P.O. Box 1090
Anderson, IN 46015

Elkhart Truth
Classified Department
P.O. Box 487
Elkhart, IN 46516

The Republic
Classified Department
333 Second Street
Columbus, IN 47201

*

The Indianapolis Recorder
P.O. Box 18267
2901 North Tocomo
Indianapolis, IN 46218

The Tribune-Star
Classified Department
P.O. Box 149
Terre Haute, IN 47808

The Times
Classified Department
P.O. Box 9
Frankfort, IN 46041

Evansville Courier & Press
Classified Department
P.O. Box 268
Evansville, IN 47702

South Bend Tribune
Classified Department
225 West Colfax Ave.
South Bend, IN 46626

Kokomo Tribune
Classified Department
P.O. Box 9014
Kokomo, IN 46904

The Evening News
Classified Department
221 Spring Street
Jeffersonville, IN 47130

The Journal/Courier
Classified Department
217 North Sixth Street
Lafayette, IN 47901

The Star Press
Classified Department
P.O. Box 2408
Muncie, IN 47307

The Indianapolis Newspaper, Inc.
Classified Department
307 N. Pennsylvania St., P.O. Box
145
Indianapolis, IN 46206-0145

News Sentinel/Journal Gazette
Classified Department
600 West Main Street
Fort Wayne, IN 46802

Gary Post Tribune
Classified Department
1433 E. 83rd Ave.
Merrillville, IN 46410

Michigan City News Dispatch
Classified Department
121 W. Michigan Blvd.
Michigan City, IN 46360

Chronicle Tribune
Classified Department
610 South Adams Street
Marion, IN 46953

The Herald Times
Classified Department
P.O. Box 909
Bloomington, IN 47402

Pharos Tribune
Classified Department
517 East Broadway
Logansport, IN 46947

Herald-Argus
Classified Department
701 State Street
Laporte, IN 46350

Times-Union
Classified Department
P.O. Box 1448
Warsaw, IN 46581

News-Sun
Classified Department
102 North Main Street
Kendallville, IN 46755

The Pilot News
Classified Department
P.O. Box 220
Plymouth, IN 46563

*** Minority Papers**

The Legal Notice is currently available on the Internet on INDOT's website:
<http://www.in.gov/indot/2436.htm>.

INDOT respectfully submits the foregoing DBE Goal of **one percent (1.00%)** for FFY 2012 to the Federal Transit Administration for consideration.

ATTACHMENT #2

Disadvantaged Business Enterprise Goal

Legal Notice for INDOT, Transit Programs Overall Disadvantaged Business Enterprise (DBE) Goal.

Posted Friday, May 9, 2012

This notice is published in accordance with the Code of Federal Regulations (49 CFR, Part 26). The Indiana Department of Transportation (INDOT) is proposing an overall goal for its transit programs of one percent (1%) for its Disadvantaged Business Enterprise (DBE) Program for Federal Fiscal Year 2012. The goal and the rationale for establishing it are available for inspection during normal business hours at INDOT for a period of thirty (30) days from the date of this publication. Comments on the proposed overall goal will be accepted for a period of forty-five (45) days from the date of this publication.

Comments shall be sent to:

Indiana Department of Transportation
Transit DBE goals
Economic Opportunity Division
100 N. Senate Ave. IGCN 750
Indianapolis, IN 46204
317-234-5196

*

Our Times
Classified Department
P.O. Box 2164
Evansville, IN 47728

*

The Indianapolis Recorder
P.O. Box 18267
2901 North Tocoma
Indianapolis, IN 46218

The Star Press
Classified Department
P.O. Box 2408
Muncie, IN 47307

*

Frost Illustrated
Classified Department
3121 S. Calhoun
Fort Wayne, IN 46807

The Tribune-Star
Classified Department
P.O. Box 149
Terre Haute, IN 47808

The Indianapolis Newspaper, Inc.
Classified Department
307 N. Pennsylvania St., P.O. Box 145
Indianapolis, IN 46206-0145

Palladium Item
Classified Department
P.O. Box 308
Richmond, IN 47375

The Times
Classified Department
P.O. Box 9
Frankfort, IN 46041

News Sentinel/Journal Gazette
Classified Department
600 West Main Street
Fort Wayne, IN 46802

Indianapolis Commercial
Classified Department
41 E. Washington, Suite 200
Indianapolis, IN 46204

Evansville Courier & Press
Classified Department
P.O. Box 268
Evansville, IN 47702

Gary Post Tribune
Classified Department
1433 E. 83rd Ave.
Merrillville, IN 46410

The Times
Classified Department
602 West 45th Ave.
Munster, IN 46321

South Bend Tribune
Classified Department
225 West Colfax Ave.
South Bend, IN 46626

Michigan City News Dispatch
Classified Department
121 W. Michigan Blvd.
Michigan City, IN 46360

Herald Bulletin
Classified Department
P.O. Box 1090
Anderson, IN 46015

Kokomo Tribune
Classified Department
P.O. Box 9014
Kokomo, IN 46904

Chronicle Tribune
Classified Department
610 South Adams Street
Marion, IN 46953

Elkhart Truth
Classified Department
P.O. Box 487
Elkhart, IN 46516

The Evening News
Classified Department
221 Spring Street
Jeffersonville, IN 47130

The Herald Times
Classified Department
P.O. Box 909
Bloomington, IN 47402

The Republic
Classified Department
333 Second Street
Columbus, IN 47201

The Journal/Courier
Classified Department
217 North Sixth Street
Lafayette, IN 47901

Pharos Tribune
Classified Department
517 East Broadway
Logansport, IN 46947

Herald-Argus
Classified Department
701 State Street
Laporte, IN 46350

Times-Union
Classified Department
P.O. Box 1448
Warsaw, IN 46581

News-Sun
Classified Department
102 North Main Street
Kendallville, IN 46755

The Pilot News
Classified Department
P.O. Box 220
Plymouth, IN 46563

*** Minority Papers**

