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September 17, 2014

Trish Serratore
President
Automotive Youth Educational Systems
101 Blue Seal Drive, SE
Leesburg, VA 20175

Re: ASE Industry Education Alliance

Dear Trish:

I understand that as part of the discussions with certain dealers and manufacturers with regard to the ASE Industry Education Alliance and the placement of student interns in the service departments of these facilities that the organizations are indicating an inability to take on these interns because of legal restrictions.

The Fair Labor Standards Act (FLSA) prohibits minors under age 18 years old to work in any occupation that it deems to be hazardous. Interns under your program may not even be subject to FLSA since it is quite possible that they meet the test of an "intern" under the FLSA regulations. In addition, the list of those occupations which are deemed "hazardous" is very narrow and is limited to such occupations as excavation, manufacturing explosives, mining, and operating many types of power-driven equipment. The limited list of hazardous occupations can be found in Title 29 of the Code of Federal Regulations and does not include automotive dealerships or service bays (see 29 CFR §570.50 - §570.68).

If you should have any questions, please do not hesitate to contact me.

Sincerely,

Steven Benson