

be duplicating at considerable added expense and great confusion the enforcement organization which already exists in the established Wage and Hour Administration.

Otherwise, employers, as well as their employees, would be confronted with still another Governmental agency applying different regulations, different enforcement procedures, different employer coverage, and different penalties.

INTERNAL EMPLOYMENT PRACTICE

If Congress, in its wisdom, should insist upon including in this legislation internal promotion and other related problems and facilities, then we strongly urge that those individuals defined in Section 13(a)1 of the Fair Labor Standards Act should be exempt from such promotion and related policies. These individuals are bona-fide executive, administrative and professional employees and are currently exempt from the Fair Labor Standards Act and the Equal Pay Act of 1963 if they meet the tests prescribed by the Wage and Hour Administration.

We sincerely thank the Committee for making available this opportunity to submit our views in writing on this pending legislation. We hope you will give these views your personal and favorable consideration.

Respectfully submitted,

NATIONAL RETAIL MERCHANTS ASSOCIATION.

AUGUST 11, 1967.

○