

heads of agencies and commissions have too many duties unrelated to procedure to permit them to devote time for consultation necessary for the purposes of this Conference. The general counsel are really the workmen in this area.

3. That alternates or substitutes be permitted. We believe very firmly that to permit alternates would destroy the coherence and the continuity essential to the success of the Conference.

I suppose it is obvious that I favor the bill. I do so for two fundamental reasons:

1. I believe our democratic system of Government can be made to work effectively even in the hurly-burly world of modern industry and business.

2. I believe this plan reflected in S. 1664 is not only the best but the only plan which holds promise of yielding actual practical results toward elimination of these vital defects in Government agency procedures.

With your indulgence, I would like to mention, in just a few words, the reasons which underlie this latter conclusion. I name 15 in 1 sentence each.

1. This Conference would be the agencies themselves in action in respect to their own procedures, just as the Judicial Conference is the courts in action.

2. The Conference would command, within its own membership, a vast reservoir of ideas and suggestions.

3. It would embody a vast reservoir of varied experience.

4. The judgments of the Conference would be composite judgments.

5. The studies of the Conference would be continuous, not one spot study with a single report to be printed, bound, and filed.

6. An officer of the Conference would be a full-time dutyseeking implementation of recommendations.

7. The suggestions of the Conference would go to the agencies as from the agencies themselves, and not as from some outside critic.

8. The Conference would be a ready vehicle for the use of the Congress in its frequent duty of ascertaining the views of the administrative agencies on technical problems of procedure.

9. The Conference would not be a matter of temporary appointment, subject to possible partisan pressures, but would be a continuous operation in its major aspects, a technical nonpartisan effort.

10. No new agency is created, no superbureau; it is a Conference machinery for existing agencies.

11. It provides an exciting forum for the exchange of ideas and experiences.

12. It would bring, as the past Conference brought, a sense of unity, a semblance of systemization, to the widely sprawling Federal agencies.

13. It would bring under realistic test the possibility of uniformity in some aspects of agency procedure.

14. It would develop information in areas now totally unknown, such as overall statistics on agency proceedings and efficient methods of trying agency cases.

15. The Conference would be a relatively inexpensive undertaking, the costs being travel expenses, per diem fees of research experts, and the salary of the Chairman and the secretarial staff.