

selves, the Conference urged that the proposed organization be composed largely of Government personnel, but with a sufficient number of outside experts to assure objectivity and a variety of views.

Individual agencies themselves, of course, have the primary and major responsibility for maintaining fairness while, at the same time, improving the decisional process. Indeed, one of the recommendations contained in the first of the two final reports of the Conference to the President proposed the creation of an office within the agencies to continually study procedures and commended those agencies which had already undertaken a continuing study of their practices and procedures.

At my own agency we continuously reexamine our policies and procedures and rules of practice and have done so for many years. As a result of this continuing study, major organizational and procedural changes have been put into effect in recent years.

I am sure that other Federal regulatory agencies are likewise constantly striving to improve their organization and procedures.

However, the experience gained in the present Conference demonstrates that collective and cooperative consideration of mutual problems produces significant, worthwhile results, both tangible and intangible.

S. 1664 follows the general outline suggested in the letter report of the Conference to the President with respect to the composition, organization, and structure of the proposed continuing Conference. Section 4(b) of the bill provides that the proposed Conference be composed preponderantly of Federal officials and personnel as recommended in the letter report to the President.

In this regard, S. 1664 differs drastically from some other proposals which would not insure dominant representation of Federal officials and personnel. Section 6(b) of the bill provides that the Council be composed preponderantly of Federal officials and personnel.

I believe this provision represents an improvement over the Conference recommendation which did not specifically call for a preponderance of agency officials and personnel on the Council. Any proposal that personnel outside the agencies should dominate the proposed Conference would be undesirable in my view.

I believe legislation creating a permanent Conference should provide that personnel from the agencies play a major role in the organization. There is no real substitute for the firsthand knowledge and experience of agency officials and personnel.

Mutual consideration of related problems by the regulatory agencies is the keystone of the proposal of the Conference for the establishment of a permanent organization.

As suggested in the letter of the Conference to the President, the agencies ought in all fairness be afforded the opportunity and supplied the machinery to collectively attack their own problems. Moreover, recommendations for changes in agency procedure are more likely to be adopted if they come from an organization that is agency oriented.

Under S. 1664 the total membership and composition of the Conference is to be determined by the Chairman with the approval of the Council. This provision is sound and would provide the flexibility needed to facilitate organization of the continuing Conference.