that committee was as broad as is the entire subject of judicial review of administrative action, whether pertaining to court review of administrative action arrived at through the formal procedures of the Administrative Procedure Act or otherwise.

For example, the de novo proceedings that were adverted to this morning and which are specifically exempted from the coverage of the bill now pending before you were a subject of investigation by the previous Conference.

An illustration of the significance of the subject of judicial review and of the need for this study and investigation, is graphically set forth in a current article by Judge Henry J. Friendly entitled "The Gap in Lawmaking—Judges Who Can't and Legislators Who Won't," which appears in the Columbia Law Review, volume 63, beginning at page 787, and the excerpt which I will now read is on page 796.

Speaking of judicial review and the varying procedures, he says:

> Some orders are reviewable by a single district judge with appeal to a court of appeals, some by a "statutory" district court of three judges—one of whom must be a circuit judge—with direct appeal to the Supreme Court, some by a court of appeals of appropriate venue, some only in the Court of Appeals for the District of Columbia; in other cases, no method of review is provided. The periods in which review may be sought are even more variegated, 15, 20, 30, 60, and 90 days, 3 months, 6 months, and no limits at all. Sometimes the period starts with the entry of the order, sometimes with its mailing, sometimes with the giving of public notice. In some cases, rehearing must first be sought, in others not. Some orders are immediately effective unless stayed, others have no effect until enforced, still others will be effective save for a petition to review which works an automatic stay. These differences create pitfalls for the unwary practitioner and undue interpretive burdens for the courts. Whatever the historical reasons for this efflorescence of variety, its continuation is unworthy of an ordered legal system. No vital interests are at stake here; these weeds have grown simply for lack of a gardener.

The Administrative Conference through the Judicial Review Committee, in studying the question of judicial review despite the fact that it was limited only to some 15 months of tenure, supervised and brought about the setting forth of all of the statutory provisions, Federal statutory provisions, for judicial review of Federal administrative action, in a monograph prepared by the committee and submitted to the Administrative Conference. That basic source material for subsequent research in this field is of an extremely valuable nature.

Nowhere else is there set forth a complete compendium of the statutory provisions relating to judicial review of administrative action.

If this bill now pending before you were to be enacted in its present form, such a study by a permanent conference could only be piecemeal. It would be incomplete. Many of the statutory provisions for judicial review of administrative action pertain to the review of matters that would not be covered by the jurisdiction as defined in the present bill, and therefore there could be no jurisdiction in the Administrative Conference to make a complete, exhaustive study of the whole field of judicial review of administrative action.

I think this illustration serves two purposes. One, to show the desirability of an Administrative Conference in the first place, and second, the desirability of having it have very broad range in which it may work.