

In making this comment, I am not doing so in a critical sense because it probably reflects one inherent facet of human nature. Rather, I am stating a fact which must be accepted as a truism unless one is to engage in a process of self-delusion.

But the desirability of a permanent Conference, established by legislation, is not to be predicated solely upon the fact that such a Conference will undoubtedly be more successful in getting the agencies to effectuate recommendations made by the Conference than has been the case in the past. By far, the greater desirability for a permanent Conference stems from the factor to which I have previously referred, namely, the Chairman and his staff will give constant and professional attention to the problems of administrative law and procedure.

There really can be no substitute for this. It is one of the most pressing needs in the field of administrative law and procedure. There is no one to whom a person may go and complain of an injustice; there is no one to whom a person may go and suggest ideas for improvement; there is no one, if the subcommittee pleases, who drives to work every morning in the city of Washington with the thought in mind that "it is my duty, throughout the day, to give my attention to the problems of administrative law and procedure, to look at the process as a whole, to hear complaints, and to initiate projects which I feel will be helpful to the Government and to the public."

I think I should say a word about the concept of the Chairman of the Conference as envisaged by the American Bar Association. He is to be the Chief Executive Officer of the Conference and will preside over the sessions of its Council and its Assembly. He is to serve for a 5-year term under Presidential appointment and Senate confirmation, and his compensation is to be equivalent to that of an Under Secretary of an executive department.

An official so appointed and so compensated will take his place in the hierarchy of our Government at a level which will enable him to perform his task effectively. To such position men of stature and learning will be attracted, and I may add that it is the concept of the American Bar Association that a man of high professional skill in the field of administrative law and procedure will be appointed to the position.

To those of us who have labored for so long in the field of administrative law, the concept of an Administrative Conference of the United States, headed by such a Chairman, is an exciting one. Certainly, we are not naive enough to think that such legislation, alone, will solve the problems. We do believe, however, that if the Congress will enact the legislation it will, for the first time, establish a basic instrument for solving the problems of administrative law and procedure.

There are one or two peripheral matters to which I would like to call the attention of the subcommittee. One of these relates to the need to include, in the proposed legislation, specific provisions so as to make it clear that service by nongovernmental personnel with the Conference will not be deemed to bring such individuals within the scope of certain statutes which otherwise might serve as a practical bar to the ability of the Government to secure highly qualified individuals as members of the Conference. The American Bar Association bill for the establishment of an Administrative Conference contains such lan-