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HOW TO FIND AND USE FEDERAL LEGISLATIVE MATERIALS

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and
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SINCE the founding of our national constitutional government, the amount of Congressional legislation has increased to Brobdingnagian proportions. It was recently pointed out by Mr. Justice Frankfurter that whereas only 287 acts were passed by Congress during the sessions from 1789 to 1793, 993 statutes were enacted by a single session of the 70th Congress. This increase in the output of legislation has produced an inevitable effect on litigation before the United States Supreme Court with the result that the center of gravity of the work of this court has indisputably shifted from common law litigation to litigation resting primarily on statutes. The following statistics clearly illustrate this shift: in the year 1875, 40% of the cases before the Supreme Court involved common law issues, in 1925 the number had dwindled to 5% of the total cases and today almost all cases considered by the Supreme Court concern a statute in whole or in part.\(^3\)

Running a roughly parallel course with the rising predominance of statutory litigation, there has evolved a new method of statutory construction, the purpose of which is more closely to effectuate the intent of the legislature. This evolution has seen its most active period since the advent of the New Deal. Before that time, lawyers and judges alike were quite confident of their ability to extract the purpose of a statute by merely seeking out the plain meaning of the words as they appeared in the statute itself. But today it has become obvious to the legal profession that an interpretation in the conservative tradition of dry literalism often perverts the intent of the legislature.\(^3\) While formerly the so-called "plain meaning" rule of statutory construction excluded

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\(^1\) Frankfurter, Some Reflections on the Reading of Statutes, 47 Col. L. Rev. 527 (1947).
\(^2\) Ibid.
\(^3\) For the contribution of Judge Learned Hand to a more imaginative interpretation of statutes, see 60 Harv. L. Rev. 370 (1947).
any consideration of the specific legislative purposes of the law, today the meaning of a statute is distilled not alone from its text but from many extrinsic materials as well. Where the meaning of legislation is doubtful or obscure, ambiguity may be clarified by resort to reports of the Congressional committee which considered the bill, or to remarks on the floors of Congress by those sponsoring the bill, or to a comparison of successive drafts or amendments of the measure, or to debates in general in order to show common agreement on purpose as distinguished from interpretation of particular phraseology.

Although certainly not new, the technique of legislative materials has been adopted to surround the bony words of a statute with the flesh of Congressional intent. Indeed, today it is not only fashionable, but necessary, for a lawyer to spell out the motive, intent, and conditions surrounding the passage of the statute in order to breathe life into the statute itself.

The importance of the technique of legislative materials is well illustrated by the recent case of United States v. United Mine Workers of America. In this case, the Supreme Court was concerned with the question of whether the Norris-LaGuardia Act, which in specified cases forbids the issuance of an injunction by federal courts in labor disputes, prohibits the issuance of an injunction in disputes between the United States Government and a union. Chief Justice Vinson, in construing the statute so as to exclude the government as an employer from the provisions of the Act, made fourteen references to the Congressional Record. Mr. Justice Frankfurter, who came to the opposite conclusion on this point, resorted to the Congressional Record in twenty-one instances, and in addition cited the hearings of a sub-committee of the House Judiciary Committee, a Senate committee report, and a conference committee report.

9 E.g. Holy Trinity Church v. United States, 143 U. S. 457 (1891).
From a realization of the vast increase of statutory law coming within the purview of the courts and of the expanding concepts of construction methods, it is apparent that the lawyer must include a knowledge of legislative materials extrinsic to the actual text of legislation as a part of his legal education. Although brief articles touching on this subject have appeared from time to time in the Law Library Journal, there has been no comprehensive treatment of this problem. It is the purpose of this paper, therefore, to break the fertile ground of federal legislative research, at times coordinating what material already exists, and at others providing a systematic approach to a technique.

I. THE LEGISLATIVE RESEARCH

In order to focus the meaning of a statute, the researcher must first assemble a legislative history of the particular statute. A legislative history should contain every official document ever printed which in any way throws light on what took place in the collective Congressional mind when the bill was introduced, placed in committee, reported, debated, amended, and passed. More specifically the researcher should assemble, if available, (1) the Presidential message asking for the specific legislation, (2) the original bill introduced in the House or the Senate, and if possible, all printings of the bill with amendments, (3) Senate and House committee hearings, if printed, (4) the reports of the Senate and the House committees, (5) debates on the bill, including the debates on any amendments, whether the amendments were passed or not, (6) the report of the joint committee of the Senate and the House, if a joint committee was operative, (7) the printing of the law as passed by Congress, (8) the Presidential veto message, if the veto power was exercised by the President, (9) the Congressional debate on the bill when passed over a veto, if the bill was passed over a veto, (10) any amendments to the bill after veto, whether the amendments were accepted or not.

It should be apparent from the scope of essential legislative materials that the materials once assembled actually constitute a complete history of the legislation.

The legislative materials listed above may be obtained from nine main sources. Only a brief description of these sources will be given here.\textsuperscript{11}

\textsuperscript{11} For a more complete summary, see Schmeckebier, Government Publications and Their Use, c. V (1939).
1. The Congressional Record is printed daily while Congress is in session. It reports the debates in both houses of Congress and all action taken by Congress on any bill that is introduced. In addition to the daily edition of the Record, a bound edition for the entire session is published after the session has terminated. It must be noted that neither the daily nor the bound edition of the Record contains a verbatim report of the remarks of senators or representatives during debate. Members of Congress are given the privilege of extending their oral remarks in writing by permission for "leave to print" obtained from the presiding officer of the House or the Senate. Also, before the verbatim reports are passed on to the printers they may be submitted to the individual congressman for grammatical and editorial changes. In some cases matter which has been included in the daily Record under the "leave to print" privilege has been expunged from the bound Record when subsequently found embarrassing.

An index to the daily Record was formerly printed bi-weekly but, beginning with the first session of the 80th Congress, this index has been replaced by a daily digest which is printed as a part of the daily Record. This daily digest is extremely useful to the researcher for, at a glance, it is possible to summarize the daily action taken by each house of Congress, the matters under debate, the calendar for the following day, and the committee calendars.

The bound edition of the Congressional Record is cited in the following manner, 41 Cong. Rec. 1251 (1909); while the daily Record is cited as, 77 Cong. Rec. 5256 (June 7, 1933).

2. The Senate Journal is published by Congress to report the proceedings of the Senate. It differs from the Congressional Record in that it contains only the action of the Senate and excludes the debates.

3. The House Journal is a counterpart of the Senate Journal.

4. Senate committee reports contain the findings of fact, analyses, and recommendations of the appropriate Senate committee which has considered a specific piece of legislation. The committee reports also contain drafts of a bill as it entered the committee and amendments added by the committee. Senate reports are numbered and are cited as: Sen. Rep. No. 5922, 59th Cong., 1st Sess. 520 (1917).
5. House committee reports serve the same purpose as the Senate committee reports. They are also given a number and are cited as: H. R. Rep. No. 2119, 59th Cong., 1st Sess. 806 (1917).

6. Reports of joint committees of the House and the Senate contain the findings of fact, analyses, and recommendations of a joint committee convened to resolve or compromise the differences that have arisen between the two houses of Congress in drafting a specific piece of legislation. They are designated and cited as either a House or Senate Report, depending upon whether the report is ordered to be printed by the House or Senate.

7. Committee hearings contain the transcript of testimony given before Congressional committees. Printings of hearings are not made in all cases, but must be specifically ordered by the committee. Hearings are cited in the following manner: Hearings before Committee on Ways and Means on H. R. 5664, 73rd Cong., 1st Sess. 114 (1938).

8. The Statutes at Large contain the public and private acts of the United States, all resolutions, proclamations, and treaties. One volume is published for each session of Congress and contains the laws passed during that session. Each volume is divided into two parts, part I (public acts) and part II (private acts, resolutions, proclamations, and treaties). Each part has a separate index. The Statutes at Large provide the actual text of the laws of the United States. It is to be noted that the United States Code does not purport to print the actual text of an entire law in many cases, but is merely a restatement of the law. The courts only give prima facie respect to the accuracy of the Code. For that reason the Statutes at Large must be the preferred tool of the researcher. They are cited as 52 Stat. 1094 (1938).

9. Although generally unavailable, the original Congressional printings of bills and resolutions should be mentioned. While printings of current bills in their various stages of passage may be obtained from members of Congress, only the Library of Congress and the Senate and the House librarians assemble and bind bills and resolutions into permanent volumes. However, this fact does not hinder the researcher, for the text of bills, as they go into committee, may be obtained in most cases from the committee reports. Standard abbreviations of bills and resolutions are:
HOW TO FIND

Senate:
Bills (S.)
Resolutions (S. res.)
Joint resolutions (S. j. res.)

House:
Bills (H. R.)
Resolutions (H. res.)
Joint resolutions (H. j. res.)
Concurrent resolutions (H. con. res.)

To find a library which contains the publications necessary to compile a legislative history is the most difficult problem encountered by the lawyer in legislative research. In most cases, particularly when the lawyer does not practice in or near a large city, there is no convenient access to Government publications. The difficulties which attend the insufficient library circulation of Government publications are most apparent and injurious when the practitioner is concerned with legislation that has become law a year or more prior to the commencement of research. The problem of obtaining Government publications bearing on current legislation is not as acute, for there are methods by which any lawyer can obtain necessary materials without being dependent on the services of a library. Let us consider specifically where and how Government publications may be obtained.

1. Depository Libraries. Congress has designated certain public and institutional libraries throughout the country as depository libraries for Government publications. There are two types of depository libraries; namely, type A which is entitled to receive all publications sent to libraries by the Government Printing Office, and type B which receives only those publications which the library itself chooses. Type A libraries do not receive all publications of the Government, but since 1938 these libraries receive all the publications essential to legislative research with the exception of material that is excluded because of its confidential character.12

The location of depository libraries of a given state, while originally determined by the choice of senators and representatives elected from the state, is now permanent and cannot be changed.

12 It is interesting to note that the Senate and the House Journals are the only publications of Congressional proceedings required by the Constitution. U. S. Const. Art. I, § 5.
from session to session. Under the original laws providing for depository libraries, each representative could designate a depository library within his Congressional district and each senator could also name an additional library. Yet it is surprising to note that even with the present importance of legislative materials some states do not have their quota of depository libraries. For example, in 1940 the State of West Virginia contained only one type A library, and the State of Virginia contained only two type A libraries.

It is possible for the researcher to obtain a list of the depository libraries in his state by referring to Schmeckebier.

2. The Superintendent of Documents. Most current publications and some past publications of the Government may be obtained directly from the Superintendent of Documents, Washington, D. C.

Current publications may be ordered by reference to the Monthly Catalogue of United States Government Publications issued by the Superintendent of Documents. The catalogues list the publications under the house of Congress and committee of origin and provide the title, key number, price, and availability of copies. The purchase price, which is usually quite nominal, may be forwarded by money order or coupons from script books previously purchased from the Superintendent of Documents. It is also possible for a lawyer to keep a cash balance with the Superintendent and receive all publications in a particular field of legislation. For example, a practitioner engaged in labor law can enter a standing order secured by a cash balance and receive automatically all reports and hearings issued by the Senate Committee on Labor and Public Welfare and the House Committee on Education and Labor.

Past publications may be ordered by reference to the Biennial Catalogue of United States Government Publications issued by the Superintendent of Documents. To obtain the correct volume of the Catalogue, it is first necessary to determine the session of Congress which provided the publications. But the researcher must be warned that most publications which are not current usually go

14 For the history of this legislation, see Schmeckebier, Government Publications and Their Use 106-14 (2d rev. ed. 1939).
15 The West Virginia University Library at Morgantown.
out of print in a very short time. In some cases the Superintendent will retain a small stock of bound Congressional Records or committee reports, but any surplus of past publications is the exception rather than the rule. It is generally true that hearings, if not ordered immediately after publication, cannot be obtained from the Superintendent. Because only current publications are usually available, direct purchase from the Superintendent will not aid the researcher concerned with legislation which has been on the statute books for several years.

3. Senators and congressmen. Another method of obtaining Government publications is by requesting copies directly from a senator or congressman. Each senator and congressman is entitled to several copies of reports and hearings for his own use and he may obtain additional copies free of charge if the supply is adequate.

4. Law Libraries. Government publications may also be found in the libraries of law schools, bar associations and private law libraries. It is apparent that availability in these libraries can only be determined by private investigation. The feasibility and need of such libraries providing legislative materials will be discussed in a subsequent section of this paper.

Once having gained access to legislative materials, the researcher is confronted with the problem of how to use the materials effectually and expeditiously. The mechanical problem of pursuing a legislative history, like most problems in legal research, is essentially one of technique. A suggested technique found to be adequate contains the following steps:

1. First, the official citation of the law in question must be obtained. This citation will be to the Statutes at Large; for example, 52 Stat. 1020 (1938). If only the popular name of the law is known, the citation may be obtained from Shepard's Popular Name Index or the USCA Popular Name Index. If only the subject matter of the legislation is known, the citation may be found accompanying the actual legislation appearing in the United States Code or United States Code Annotated, the subject matter having been traced to legislation by employing the correct title volume of the Code. If the session of Congress which passed the law is known, the citation may be directly obtained from the index of the appropriate volume of the Statutes at Large, since each volume bears the number of a session of Congress. If the legislation
is so recent that the Statutes at Large volume for the session has not been published, the first step will naturally not be taken, and the researcher will begin with step two.

2. The second step is to locate the official text of the statute. Since the Statutes at Large citation has already been obtained, the researcher may proceed directly to the volume of the Statutes at Large which contains the official text. If the statute is so recent that the appropriate Statutes at Large volume has not been published, the text of the statute may be obtained from the slip-law edition of the law. The text of current legislation may also be found in the appropriate supplement of the United States Code Congressional Service.

3. The third step is to obtain the number of the bill that instituted the legislation. The bill number accompanies the text of the statute in the Statutes at Large, the slip-law edition, and the United States Code Congressional Service. Another method by which the bill number of a current bill may be found is by the use of the CCH Congressional Index Service.

4. The fourth step is to procure the numbers of the committee reports and hearings on the legislation in question. Report and hearing numbers may be obtained from the History of Bills and Resolutions section of the Congressional Record Index, the Congressional Comment section of the United States Code Congressional Service, the CCH Congressional Index Service, or in some cases, a specific analysis of the law published by a “law service.” After these numbers have been obtained, the specific re-

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17 The slip-law edition of a law is a printing of the individual law published by the Government Printing Office immediately after the passage of the law. It is issued to depository libraries and may also be obtained directly from the Superintendent of Documents. It is listed in the Monthly Catalogue of United States Government Publications.

18 The United States Code Congressional Service, published by the West Publishing Company and the Edward Thompson Company, contains the texts of public acts enacted during a session of Congress. Supplements are published throughout the session at approximate six-week intervals, depending on the subject and amount of legislation. The supplements are very useful for current research. A section of this publication, entitled Congressional Comment, based on official committee reports, hearings, and Congressional debates is a valuable prognosis for the findings of future detailed research.

19 The CCH Congressional Index, a cumulative Congressional reporter, published by the Commerce Clearing House, is an invaluable tool for current research. Bills before Congress are indexed according to name, number, and topic. Insertions mailed to subscribers show the status of each bill, the dates of introduction, hearings, committee reports, amendments, passage, signing, and effective date of the law.

20 E.g. CCH, Pamphlet, Labor Management Relations Act (1947).
ports can be identified and located. To obtain copies of the specific reports and hearings from a depository library, it is necessary to use the Monthly Catalogue and translate the Congressional numbers of the reports and hearings into the classification numbers assigned by the Superintendent of Documents. These latter numbers are those by which these publications are classified and filed in a library.

5. The fifth and last step is to obtain the specific Congressional debates on the legislation. Having already found the bill number, the researcher enters the Congressional Record Index for the appropriate session of Congress with the bill number and procures all page references to the bill. It must be noted that the researcher must be careful to determine both the Senate and House bill numbers in case the law has issued from the joint committee marriage of independent legislation originating concurrently in each house of Congress. If the legislation is so current that the bound edition of the Record has not appeared, there will be no index to the daily Record to aid the researcher. In this case the researcher must determine the date the bill was reported from committee and scan the daily digest of the Record from that date until final passage to find the pages of debate.21

II. ILLUSTRATION OF RESEARCH — SCOPE OF THE COMMUNIST CLAUSE, LABOR MANAGEMENT RELATIONS ACT (TAFT-HARTLEY ACT)

The technique of legislative research can be viewed more easily through the confines of a specific problem of legislative intent. For this reason an actual research problem has been prepared so the reader can check the technique by reference to the citations of essential materials. The findings, which follow the description of the technique employed, are not offered as a complete solution of the legal question involved, but merely as representative examples of pertinent material that tend to point to the legislative intent.

The Problem. In October, 1947, the National Labor Relations Board reversed its General Counsel, Robert N. Denham, and ruled that the top executive officers of the AFL and the CIO would not have to sign the anti-Communist affidavit of the Taft-Hartley

21 A most convenient method of finding the date of the report from committee is by reference to the status table of the CCH Congressional Index Service.
Act before their affiliate unions could be protected by the provisions of the Act. What was the legislative intent in regard to this feature of the Act?

The decision of the National Labor Relations Board was found in the Bureau of National Affairs Labor Relations Reporter, 20 LRRM 1319 (1947). The official citation of the decision is 75 NLRB No. 2 and its content is as follows:

Local 1215 of the International Brotherhood of Electrical Workers and the IBEW had both complied with section 9(h) of the Labor Management Relations Act (1947) which provides that the NLRB will not recognize any local union unless the officers of the local union and the officers of the national or international union with which the local union is affiliated have signed affidavits indicating that they are not members of the Communist Party. The local union petitioned for certification as collective bargaining agent for the employees of the employer. The Regional Director of the NLRB denied the right of the local to petition on the ground that officers of the American Federation of Labor, of which the IBEW is a member, had failed to sign the non-Communist affidavits. On appeal from a decision of the General Counsel of the NLRB upholding the Regional Director's order, held, reversed. Section 9(h) of the Labor Management Relations Act (1937) does not include within its meaning parent federations such as the AFL. In re Northern Virginia Broadcasters, Inc., Radio Station WARL and Local Union No. 1215, International Brotherhood of Electrical Workers (AFL), 75 NLRB No. 2 (1947).

Research Technique. The official text of the Labor Management Relations Act was obtained from the slip-law edition. The citation of the slip-law edition was found in the August Catalogue of United States Government Publications, p. 955. The slip-law was procured in a depository library. The Act is designated as Public Law 101, 80th Cong., 1st Sess. When the appropriate volume of the Statutes at Large is published, the Act will appear in Chapter 120, 80th Cong., 1st Sess. The unofficial text was found in a supplement of the United States Code Congressional Service — Supplement (May 28 to June 23, 1947), pp. 135-168; and also in CCH Pamphlet, Labor Management Relations Act, (1947) pp. 95-121.
2. The Senate and House bill numbers were culled from the CCH Congressional Index (1947) by reference to the topical index, p. 103 and p. 279. A complete chronological status table of S. 1126 and H. R. 3020 was found in the same publication at p. 1813 and p. 4927.


4. Hearings before the Committee on Labor and Public Welfare, United States Senate, 80th Cong., 1st Sess. on S. 55 and S. I. Res. 22 were found in the May Catalogue at p. 518. Hearings before the Committee on Education and Labor, H. Rep., 80th Cong., 1st Sess. on H. R. 8, H. R. 725, H. R. 880, and H. R. 1095, 1096 were found in the April Catalogue at p. 879. The correct citations were obtained and the hearings were secured from a depository library.

5. The dates on which the bills were reported were obtained from the CCH Congressional Index at p. 1813 and p. 4927. All digests of the daily Record were scanned from those dates until final passage over the President's veto to find the pages of debate in each house of Congress. All amendments to the bills, the veto message, and the vote on the final bill were found in the daily Record.

The Findings. The following verbatim and paraphrased excerpts from the legislative materials were found to be relevant to the legislative intent of section 9(h) of the Labor Management Relations Act (1947). Italics have been provided by the authors.
1. "Although it is possible to extract a few quotations from the Congressional Record and Committee Reports to support either viewpoint . . . quotations all prove on analysis, to be disappointingly peripheral. . . . Congress gave little or no direct thought to the question of whether the great parent federations would have to satisfy these requirements."22

2. "In the absence of clear expression of legislative intent to the contrary, Congress when legislating on a specialized subject is deemed to have used words in the sense in which they are understood by those who deal daily with that subject."23

3. "(h) No investigation shall be made by the Board of any question affecting commerce concerning the representation of employees . . . unless there is on file with the Board an affidavit executed contemporaneously or within the preceding twelve-month period by each officer of such labor organization and the officers of any national or international labor organization of which it is an affiliate or constituent unit that he is not a member of the Communist Party. . . ."24

4. "(The bill) does, however, go to the root of the evils and provides a fair, workable, and long overdue solution of the problem. In brief outline the bill accomplishes the following . . . (8) It prohibits certification by the Board of labor organizations having Communist or subversive officers."25

5. "Although there are instances in which Communists have used unions as 'front' organizations the Board holds evidence of their influence to be irrelevant. Communists use their influence in unions not to benefit the workers, but to promote dissension and turmoil. They should be weeded out of the labor movement."26

6. The text of section 9 (h) of H. R. 3020 as recommended by the joint committee of the Senate and the House is identical with that of the original House bill.27

7. "In reconciling the two provisions, the conferees took into account the fact that representation proceedings might be indefinitely delayed if the Board was required to investigate the character of all the local and national officers as well as the character of the officers of the parent body or federation."28

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22 Text of the majority opinion, Northern Virginia Broadcasters, Inc., 75 NLRB No. 2 (1947).
23 Ibid.
26 Ibid. at 38.
8. Senator Taft amplified the above statement by stating that the affidavit as a condition precedent to recognition would obviate the necessity of the Board investigating the Communist affiliations of officers of all levels of the labor movement.29

9. Senator Murray in objection to section 9 (h) referred to the section's effect on the labor movement.30

10. The veto message sent to Congress by President Truman complains of the effect of the affidavit required by 9 (h) of "all its (union) officers" and on "labor organizations," and on the "entire national labor movement."31

III. RECENT DEVELOPMENTS TO AID RESEARCH

Heretofore we have discussed compilation of legislative histories by one method, namely, assembling the legislative materials after the passage of a law. A more thorough and certain method to assemble legislative materials is by means of the current legislative history, compiled during the entire period of legislative gestation. The advantages of this latter method are obvious. When the researcher needs a history for research it is already compiled for him. Also, and most important, the current legislative history avoids the pitfalls of out-of-print or otherwise unavailable material.

Keeping a current file on all bills before Congress which may become important laws is a job requiring the full attention of an experienced librarian and is consequently a method employed mainly by Government agencies. We are aware of only one private law firm at the present time that has such a primary interest in Congressional legislation as to justify such a method.

The technique of such a method is essentially the same as is employed by the researcher when assembling a history retrospectively. The librarian, by scanning the daily Digest of the Congressional Record, determines which bills warrant filing. The file usually is not started until the bill has come out of committee, because the majority of bills die in committee and do not become law. Once the bill has been reported, pertinent pages of the daily Record, any companion or related bills, and all reports and hear-

29 Id. at 6604.
30 Senator Murray objecting to section 9 (h) of H. R. 3020, 93 Cong. Rec. 6656 (June 6, 1947).
31 93 Cong. Rec. 7503 (June 20, 1947).
ings are placed in the file. When the legislation becomes law, the slip-law edition of the act completes the file.\textsuperscript{32}

A history of the "Case Bill," compiled and bound by a private law firm, is a good example of such a current history. It contains the following material:

**Volume I**
1. Introduction of the bill with 81 amendments.
2. The Senate debates.
3. Remarks of individual senators.
4. The President's veto message.
5. The President's proposal for temporary labor legislation.
7. President Truman's address to Congress concerning the railroad strike.
8. The House debates.
9. The President's address to the Joint Senate and House Committee.

**Volume II**
1. Copy of H. R. 4908 (Case Bill).
2. House report.
3. Senate report.
4. Hearings before the House committee.
5. Hearings before the Senate committee.

In addition to the above materials, the librarian included a brief chronological report of all action taken on the bill.

If the lawyer is within reach of Washington, D. C., he will be able to procure legislative histories that have been compiled currently. Within the past two years, a service has been instituted by the Law Librarian Society of the District of Columbia. This service or aid is the Union List of Legislative Histories. The purpose of the list is to make available to the law profession legislative histories which are located in the law libraries of the District. The list has been published in the *Law Library Journal*,\textsuperscript{33} and additions will continue to appear there.

The list is divided into two parts. The first contains the location of all cooperating libraries, the type of material each library prepares, the conditions under which the histories may be used, and a code number assigned to each library. The second part

\footnotesize{\textsuperscript{32} For an excellent article on the technique of the "current" method, see Finley, Legislative Histories, 39 L. Lib. J. 161 (1946).}

\footnotesize{\textsuperscript{33} 39 L. Lib. J. 243 (1946), 40 id. 62 (1947).}
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provides a list of compiled histories, together with the public law number, bill number, popular name or descriptive title, citations, code numbers of the participating libraries which will make the history available, and a few notations.

Although very rare, published legislative histories are sometimes compiled for the use of the law profession. In most cases the entire legislative history is not included but the published history, which usually contains an analysis, is a solid core for exhaustive research. Examples of such histories are Dunn on The Federal Food, Drug and Cosmetic Act, Powell on Congressional Debates on Federal Electric Power Operations and Related Questions, Seidman's two works on Legislative History of Federal Income Tax Laws, 1938-1861 and Legislative History of Excess Profits Tax Laws, 1946-1917.

IV. CONCLUSION

Although in recent years the use of legislative materials has achieved acceptance by the courts, it is unfortunate that not only law students but many mature practitioners have no comprehension of the materials available, the methods of finding the publications, and the legal importance of legislative research. While necessity and experience alone can lead the lawyer to a working knowledge of legislative materials, there should be a definitive text or manual to aid the bar in this field.

Also, as the necessity for legislative research increases, the dissemination of legislative materials must increase. Today the lawyer, if he does not have convenient access to Washington, to a large city, or to a depository library is severely handicapped by the inadequacy of his available sources of research material. The need for thought and constructive measures to meet this problem is evident. At the present time it would be unprofitable for commercial law publishers to undertake the compilation of legislative histories. However, three courses of action are possible. First, a law firm can compile its own legislative histories currently, but, as has been stated previously, the expense of this type of private effort will be prohibitive to the average firm engaged in general practice. Second, the larger bar associations which maintain their own libraries can provide trained librarians to compile legislative histories for their members. This method would be convenient, inexpensive and of immeasurable aid to the local bar. Third,
Congress can designate more depository libraries with particular attention given to geographic location. In addition, those libraries already receiving Government publications, can select, with the advice and aid of the local bar, those publications indispensable to legislative research.