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STUDENT NOTE

POWER OF ADMINISTRATIVE AGENCIES TO GRANT REHEARINGS.—
Fundamental in the field of administrative law is the proposition that an administrative agency has no inherent powers but only such powers as have been expressly granted to it by the legislature or have, by implication, been conferred upon it as necessarily incident to the exercise of those powers expressly granted.¹

For the purpose of this note it will be assumed that the power of an administrative agency to grant rehearings is not hampered by the principles of stare decisis, res judicata or estoppel to reconsider

¹ Gallagher's Steak House v. Bowles, 142 F.2d 530 (2d Cir. 1944), *cert. denied*, 322 U. S. 764 (1944); Northern States Power Co. v. Federal Power Comm'n, 118 F.2d 141 (7th Cir. 1941); *In re Electric Bond & Share Co.*, 80 F. Supp. 795 (S. D. N. Y. 1948); Michigan Consol. Gas Co. v. Panhandle Eastern Pipe Line Co., 80 F. Supp. 27 (E. D. Mich. 1948); Wheeler v. Santa Ana, 81 Cal. App.2d 811, 185 P.2d 273 (1947); State v. Atlantic Coast L. R. R., 56 Fla. 617, 47 So. 969 (1908); Portsmouth v. Virginia Ry. & Power Co., 141 Va. 54, 126 S. E. 362 (1925); State v. Dep't of Public Service, 21 Wash.2d 201, 150 P.2d 709 (1944).