STUDENT NOTES

ADMINISTRATIVE LAW—EXTENT OF JUDICIAL REVIEW—RULINGS OF THE FEDERAL COMMUNICATIONS COMMISSION.—A number of rules governing the extent of judicial review of findings of fact made by federal administrative tribunals have been formulated by various statutes and decisions. From the many cases arising as a result of the ever increasing expansion of the jurisdiction of administrative agencies and the activities regulated by such agencies there has developed one general proposition. The rule that has generally come to be determinative of the question of the scope of judicial review of findings of fact in cases before federal administrative agencies may be stated thus: the findings of fact are reviewable to the extent that the reviewing court is allowed to determine whether or not the findings are supported by substantial evidence.¹ For example, in one case involving an order of the Federal Communications Commission the United States Supreme Court said, "Our duty is at an end when we find that the action of the Commission was based upon findings supported by evidence, and was made pursuant to authority granted by Congress."²

¹ Consolidated Edison Co. v. NLRB, 305 U.S. 197 (1936). This is the rule applicable to most but not all of the federal administrative tribunals.