

Oswald Ryan
5511 Chevy Chase Parkway
Washington, D.C.

April 28, 1955

Mr. Amon Carter
New York City

Dear Amon:

I am glad to respond to your question about my plans. Having completed my period of service on the C. A. B. which followed my six and a half years as General Counsel of the Federal Power Commission, I have decided that I can best use the knowledge and experience gained in those years by resuming the practice of the law. I hope to specialize in Administrative Law, particularly in the natural gas field.

You may recall that as General Counsel of the Power Commission under the Hoover and the Roosevelt administrations I handled public utility cases in the various district, circuit courts of appeal and in the Supreme Court. In addition to this and the function of advising the Commission, I had a general supervision over the drafting of legislation affecting the Commission. In this connection, as General Counsel I had the general supervision of the drafting of the Natural Gas Act of 1938 and appeared personally before the House Committee in its final consideration of that Act prior to its enactment in 1938.

The decision of the supreme court in the Phillips Case, which last June construed the Gas Act in such manner as to place the regulatory power over production and gathering in the Federal Power Commission accomplished a result never intended by those of us who participated in the drafting of the Gas Act or by those who sponsored it in the Congress. The decision creates serious problems for the industry and the Commission chief among them, in my opinion, being concerned with the rate process as it affects production and gathering.

Should the regulatory power remain in the Federal Power Commission, it will become a matter of major importance that sound principles and standards of rate regulation shall be applied to production and gathering. It will be

important that these rate standards be suitable and adequate to the peculiar economic characteristics and needs of the industry, and this may call for a departure from conventional public utility rate standards in the case of the production and gathering of natural gas.

Now the task of developing such suitable standards and techniques of rate making and presenting them to the Commission is an attractive and interesting challenge to a lawyer who has had my experience in dealing with rate problems at the Civil Aeronautics Board and at the Federal Power Commission and in defending such policies in the federal courts. So you will understand why I shall prefer to be dealing with the problems of the natural gas industry in my law practice.

I am delighted to learn of the substantial improvement in your health. May I hope that further progress in the same direction will continue and will have your personal cooperation/

Please forgive the long hand. I do not have a secretary or a typewriter available at the moment.

Very sincerely

/S/ Oswald

Please remember me to Mrs. Carter.