

CARL BECK. *Contempt of Congress: A Study of the Prosecutions Initiated by the Committee on Un-American Activities, 1945-1947*. Pp. xii, 263. New Orleans: Hauser Press, 1959. \$4.50.

This is a useful little book. It cannot, however, be regarded as a substantial treatise on the law of contempt procedures or as a definitive study of congressional investigations. It is, rather, a well-organized compendium of committee hearings, congressional actions, and court decisions arising from the business before the Committee on Un-American Activities in the period 1945-1957. The scope of the study, the mass of evidence reviewed, and the brevity of the text (189 pages) preclude extensive investigations or a full analysis of all pertinent issues.

Beginning with two introductory chapters: "I. Development of the Contempt Process" (pp. 1-16) and "II. The Power to Subpoena Documents" (pp. 17-40), the study moves to an examination of hearings conducted by the Committee, emphasizing especially its exercises of contempt procedures, and to a summary analysis of subsequent steps including final disposition in the courts. The author has carefully assembled a mass of data and catalogued it in terms of the constitutional issues involved. He has briefly yet conscientiously traced the history of each case to its final disposition. In Appendix A he presents and identifies all contempt citations for the earlier period, 1787-1943. Appendix B and an Addendum list in chronological order all citations originating with the House Committee on Un-American Activities. In another half-dozen pages, Dr. Beck presents in tabular form selected information on a wide variety of contempt cases. The book also contains a Table of Cases, a Selected Bibliography and a brief Index. The documentation is adequate.

Even though apparently overambitious in scope, the study bears ample evidence of scholarly dedication, of great industry, and of some ingenuity in approach and treatment. Handicapped as he is by textual limitations, Dr. Beck nevertheless finds some space to state his opinions, convictions, and biases. He is impliedly unsym-

pathetic, perhaps thoroughly disgusted, with the activities of the Committee on Un-American Activities, hostile towards its procedures, and critical of both congressional and judicial review of much of the work of the Committee. One may infer that the evidence demonstrates abuses of power by the Committee and an almost complete abdication of basic responsibilities by Congress and, to a lesser degree, by the courts. I am not quite sure where the author stands on interpretations of constitutional issues. The doubts arise because too frequently Dr. Beck's appraisals and criticisms are limited to unargued and undocumented assertions and are otherwise beclouded and enfeebled for want of adequate development. In spite of its limitations, teachers and researchers in this area and period of constitutional interpretation will be indebted to Dr. Beck for this compilation of basic data.

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CORWIN D. EDWARDS. *The Price Discrimination Law: A Review of Experience*. Pp. xxii, 698. Washington, D. C.: Brookings Institution, 1959. \$10.00.

Corwin D. Edwards has produced an exceedingly illuminating and important volume even though he found it impossible to carry out his original plan. It had been hoped and planned to give only a minimum of attention to litigation before the Federal Trade Commission and the courts and to ascertain from field interviews and case studies "what happened after orders under the Robinson-Patman Act were issued" (p. ix). Unfortunately the original plan could not be fulfilled; hence it was revised "to include an analysis of the litigation under the Robinson-Patman Act as well as the changes in business practice that followed this litigation" (p. xiii). No endeavor was made to "analyze the scope and effect of the private law suits" (p. xiv) because information derived from such proceedings was not readily available.

The volume begins with a brief legislative history of the Robinson-Patman Act. This section will illuminate little for in-