NOTES AND LEGISLATION

Recent Developments in the Industrial Insurance Feature of
Workmen’s Compensation Law

Proponents of the cost-experience method of adjusting industrial
insurance payments into a state fund will discover that two recent
Supreme Court decisions\(^1\) and a prior Washington case\(^2\) result in
set-backs to their plan of improved Workmen’s Compensation law.\(^3\)

\(^1\) Gange Lumber Co. v. Rowley, et al., 66 S. Ct. 125, 1945, appealed from Row-
ley v. Dept. of Labor and Industries, 21 Wash. 2d 420, 155 P. 802, 1945; and
Copperweld Steel Co. v. Industrial Commission, 65 S. Ct. 1006, 1945, appealed
from 143 Ohio St. 591, 56 N. E. 2d 154, 1944.

393, 156 P. 2d 640, 1945.

\(^3\) Section 7676 of Remington’s Revised Statutes of Washington, 1940, which
established a detailed compensation plan, provides in part:

‘‘Inasmuch as industry should bear the greater portion of the burden of
the cost of its accidents, each employer shall, prior to the fifteenth day of
every month, pay into the state treasury (1) for the accident fund, and (2)
for the medical aid fund, a certain number of cents for each man hour
worked by the workmen in his employ, engaged in extra-hazardous employ-
ment; if, however, there should be a deficit in any class or subclass, the
Director of Labor and Industries is hereby authorized and directed to assess