

****Title:**** Romeo F. Edu, in his capacity as Land Transportation Commissioner, Petitioner vs. Hon. Vicente G. Ericta, in his capacity as Judge of the Court of First Instance of Rizal Br. XVIII, Quezon City, and Teddy C. Galo, Respondents

****Facts:****

In 1969, the Philippine Congress enacted Republic Act No. 5715, also known as the "Reflector Law," to promote road safety by mandating the installation of reflectors on all motor vehicles. The following provisions were central to this statute: (1) appropriate parking lights or flares must be visible for 100 meters when vehicles are parked in poorly lit areas; and (2) vehicles must be equipped with built-in reflectors or similar devices visible for 100 meters at night.

Teddy C. Galo, a motorist, challenged the constitutionality of the Reflector Law and the ensuing Administrative Order No. 2, issued by Land Transportation Commissioner Romeo F. Edu to implement the statute. Galo's suit for certiorari and prohibition with preliminary injunction asserted that the law and order violated the due process clause and constituted an undue delegation of legislative power.

In May 1970, a hearing on Galo's plea for a preliminary injunction took place. On May 28, 1970, Judge Vicente G. Ericta ordered the writ's issuance against the enforcement of the administrative order. On June 1, the writ of injunction was issued. The Solicitor General, representing Commissioner Edu, filed for reconsideration, but Judge Ericta denied the motion on June 9, 1970.

On June 18, 1970, Commissioner Edu filed a petition for certiorari and prohibition with the Supreme Court to annul Judge Ericta's orders. The Supreme Court required answers from the respondents, and oral arguments took place on July 2, 1970. The case was deemed ripe for decision, particularly focusing on the constitutionality of the Reflector Law and the validity of Administrative Order No. 2.

****Issues:****

1. Whether the Reflector Law violates constitutional due process.
2. Whether Administrative Order No. 2 constitutes an undue delegation of legislative power.

****Court's Decision:****

Issue 1: Due Process

The Supreme Court upheld the constitutionality of the Reflector Law, affirming that it was a valid exercise of the state's police power aimed at ensuring public safety on the roads. The

Court noted that necessary legislative protection measures were well within the state's rights and were neither arbitrary nor unreasonable. Historical doctrines of police power and the balance between state authority and individual rights affirmed the law's validity.

Issue 2: Delegation of Legislative Power

The Court also sustained the validity of Administrative Order No. 2. It ruled that the order did not violate the principle of nondelegation of legislative power because it was a legitimate administrative execution of the law's detailed provisions. The Court verified that the law provided clear standards and a specific intent towards public safety, meeting the requirements for valid subordinate legislation. The administrative rules and their execution were deemed necessary for the law's effective implementation, aligning with legislative intent without overreach.

****Doctrine:****

The case reinforced these doctrines:

1. ****Police Power and Public Safety:**** Legislative measures addressing public safety (here, road safety) are within the bounds of the state's police power and meet due process requirements when they are reasonable and not arbitrary.
2. ****Nondelegation Doctrine:**** Delegation of rule-making authority to administrative bodies aligns with constitutional principles if it includes clear standards and defined objectives, ensuring the body's actions follow legislative intent.

****Class Notes:****

- ****Police Power:**** Inherent power of the state to enact laws promoting public welfare, health, safety, and morals.
- ****Due Process Clause:**** Guarantees that laws will not be unfair or arbitrary in the deprivation of life, liberty, or property.
- ****Nondelegation Doctrine:**** The legislative branch must not abdicate or transfer its essential legislative functions, only delegating detailed execution within a framework of established standards.

Relevant Legal Provisions:

- ****Republic Act No. 5715 (Reflector Law)**** mandates the use of reflectors on vehicles for public safety.
- ****Republic Act No. 4136**** entrusts regulation details to administrative bodies with stipulations for penalties.

****Historical Background:****

- The case surfaces in a period where the Philippines, adhering to a growing recognition of government roles beyond laissez-faire principles, emphasized regulatory measures for public welfare. The mid-20th century marked a clear shift from absolute non-interference in economic affairs to a broader scope of government intervention promoting public safety and welfare through comprehensive legislation and active enforcement policies.