



THE UNIVERSITY OF MICHIGAN

ANN ARBOR, MICHIGAN 48109

March 29, 2007

Director, Regulatory Management Division  
USCIS, Department of Homeland Security,  
111 Massachusetts Avenue, NW, 3<sup>rd</sup> Floor,  
Washington, D.C. 20529.

Re: 8 CFR Part 103: DHS Docket No. USCIS-2006-0044 - USCIS Fee Increase  
Comment: The Proposed Rule "Adjustment of the Immigration and Naturalization  
Benefit Application and Petition Fee Schedule".

Dear Sir,

Thank you for the opportunity to comment on the proposed rulemaking regarding the USCIS fee increase.

The University of Michigan is deeply concerned that the proposed fee increase will compromise the intellectual integrity of the University by reducing its ability to recruit and retain the best scholars regardless of their national origin.

As one of this nation's leading research universities, the University of Michigan has long recognized the contribution international students and scholars bring to the academy. Welcoming its first international students in 1847, today the University admits approximately 1,000 graduate, professional, and undergraduate students every year. Current enrollment includes nearly 4,700 international students from over 120 countries. In addition, over 800 international scholars, plus hundreds of researchers and scientists play essential roles in the development of the cutting-edge research and generation of new ideas upon which the world depends.

America's great universities are a unique source of America's global strength and prosperity. The University of Michigan acknowledges the efforts Secretary Chertoff, Secretary of State Rice and Undersecretary of State Hughes have made to promote U.S. higher education abroad and to lower barriers for international students and scholars to come to the U.S. The proposed fee increase is antithetical to such efforts.

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The proposed fee increase creates a financial hardship for many international scientists, scholars, and graduate students who are an essential population of the University of Michigan's research capacity. Our laboratories and research centers depend on an infusion of the most talented individuals from across our nation and around the world. Through their contributions, the University is able to develop the global networks that sustain the collaborations which are vital to the highest levels of advanced research. University research funding can not pay for immigration costs, and as a result, we anticipate that the increase in fees, if enacted, will impede our recruiting abroad.

International students and scholars are facing cascading increases in costs for visas and consular appointments. Continuing to pass these costs along to the talented people we need to attract to our universities is counterproductive. The \$160 fee increase for the University of Michigan's 800 international students who apply for optional practical training annually would cost them an additional \$128,000 on top of the \$144,000 they are already paying for a total of \$272,000 annually. These increases send an unwelcoming message that denotes an historic turn away from the openness that has made the University of Michigan and other leading American universities global leaders in higher education.

At a time when global competition for the best and most talented students and scholars is strong, and when our main competitors, Canada, Australia, the United Kingdom and the European Union are easing visa access and lowering costs, the increase in U.S fees is shortsighted. As just one example, the European Research Area is building a "common market" for research innovation by lowering barriers and creating opportunities for sharing resources. Such international collaboration is critical to producing advanced research.

The University of Michigan recognizes that in today's marketplace it is critically important that all students have the opportunity to develop their studies in a global context. The lives and careers of our domestic students are touched profoundly by globalization. To address the challenges and opportunities ahead, University of Michigan students must have the opportunity to learn and do research with international faculty and students. The University of Michigan provides the State with a unique gateway to the world. We look across the border with envy at the steps Canada has taken to lower the barriers to attracting students and researchers. We should be able to do the same.

The State of Michigan is struggling to rebuild its economy in the wake of numerous corporations leaving the state. Securing the economic future of the State hinges, in no small way, on the ability of the University of Michigan and other state universities to generate innovative research and to produce new graduates who can provide leadership ready to compete in the global marketplace. This critical task requires the integration of the best and most creative minds from around the world. Our businesses must find and recruit the best talent available, and in the current economic climate the proposed additional costs for hiring a new international employee will become yet another barrier to economic recovery.

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In addition to the new burdens these fees will place on the University's efforts to internationalize, past fee increases have not resulted in improved services from USCIS. University staff who work with international students and scholars report that it remains difficult to communicate with USCIS directly. The University also is seeing an increase in the number of Service Center errors, which can take several months to correct. This inefficiency and these errors add to costs and delays for the University. We believe it unlikely that the proposed fee increases will lead to any effective improvement in service and communication.

The University believes that it is bad policy to continue to pass along these costs to international scholars and students and to impede the ability to maintain our nation's leadership in higher education and research. As a nation, we benefit tremendously from the community of intellectual talent that our universities provide. It is wise policy for the United States to continue to invest in the improved administration of visas so that we can continue to attract the best in the world.

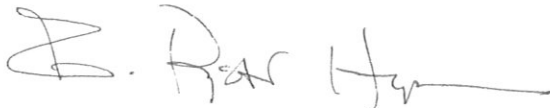
Thank you for the opportunity to comment.

Sincerely,

Handwritten signature of Teresa A. Sullivan in cursive script.

Teresa A. Sullivan

Provost and Executive Vice President for Academic Affairs

Handwritten signature of E. Royster Harper in cursive script.

E. Royster Harper

Vice President for Student Affairs