

From: mail.relay@mailmanager.net [mailto:mail.relay@mailmanager.net] **On Behalf Of** Virginia Meyer

Sent: Saturday, March 10, 2007 7:12 AM

To: USCIS Comments

Subject: DHS Docket No. USCIS-2006-0044 - USCIS Fee Increase Comment

Virginia Meyer
2024 Bonisle Circle
Palm Beach Gardens, FL 33418-6503

March 10, 2007

USCIS Comments

Dear USCIS Comments:

I am writing to you as an international educator in opposition to the February 1, 2007, proposed rule "Adjustment of the Immigration and Naturalization Benefit Application and Petition Fee Schedule." The proposed fee increase for the I-765 is so exorbitant it will act as a disincentive for international students and scholars to study and work in the United States! USCIS must reconsider the role of appropriated funds to meet the administrative needs of the agency. I ask please, that this fee especially be reduced to the actual cost of processing the application or petition.

International students and scholars, and campus officials that employ them, file tens of thousands of petitions and applications with USCIS annually, including this one:

- The near-doubling of the I-765 fee for international students in F status to apply for work authorization for Optional Practical Training, from \$180 to \$340.

This fee is contrary to clearly expressed U.S. policies. The President, the Secretary of State, and indeed the Secretary of Homeland Security have expressed clearly and often the high value that the United States places on attracting international students and scholars to this country. The United States reaps immeasurable benefits—for our foreign policy, our students' education, our economy, our competitiveness, and our public diplomacy—from attracting the best and brightest minds and the next generation of world leaders to America's educational institutions.

The I-765 fee for Optional Practical Training is a classic example. It used to be possible for school officials designated by the INS to approve OPT in accordance with agency regulations. The benefits of reinstituting and expanding this process speak for themselves: no application, no processing, no fee, one less task to be performed by the agency, more time to devote to what the agency really needs to do. There is no obvious public policy reason for USCIS to require agency approval for OPT today. With the Student and Exchange Visitor Information System (SEVIS) now fully

in place, it would be easy to devolve this responsibility back onto the schools. Yet the cost of processing this unnecessary application process continues to drive up the fee.

While I understand that USCIS is permitted by law to recover the full cost of its services through fees, and indeed has no other option so long as Congress is unwilling to appropriate funds for the operation of the agency, I ask that this I-765 fee be reduced to the actual cost of processing the application or petition.

Thank you for the opportunity to comment.

Sincerely,

Virginia P. Meyer
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