

Korean American Resource & Cultural Center
2701-A West Peterson Ave, Chicago, IL, 60659

(Tel) 773.506.9158 (Fax) 773.506.9159
www.chicagokrcc.org / krcc@chicagokrcc.org

[03/14/2007]

Director, Regulatory Management Division
US Citizenship and Immigration Services
Department of Homeland Security
111 Massachusetts Ave. NW, 3rd floor
Washington DC 20529.



RE: DHS Docket # USCIS-2006-0044

Proposed rule— Adjustment of the Immigration and Naturalization Benefit Application and Petition Fee Schedule

On behalf of The Korean American Resource & Cultural Center, I am writing to strongly oppose the increase to immigration and naturalization fees that US Citizenship and Immigration Services (USCIS) proposed on February 1, 2007.

The Korean American Resource & Cultural Center was founded in March of 1995 by young, low-income, recent Korean immigrants. KRCC's mission is to empower the Korean American community of greater Chicago through education, organizing, advocacy, social services and culture. Among the numerous services we have available here at KRCC, I am the coordinator for the New Americans Initiative (NAI) Program. The principal portion of KRCC's NAI program is to provide comprehensive citizenship services to those applying to become new citizens under the NAI program. Some examples of the services we offer include, but are not limited to, completing citizenship application, interpretation, and translation.

KRCC is dedicated in serving the Korean community as well as those of other races whom require our assistance in becoming a U.S. citizen. However, with the current increase in the fees, Korean Americans residing in Illinois will have their right to become a U.S. citizen taken away; becoming a naturalized citizen will become a fantasy, not a reality they can hope for. The

미주한인봉사교육단체협의회 가입단체 (NAKASEC)

A local affiliate of the National Korean American Service and Education Consortium, Inc.

Korean American Resource & Cultural Center
2701-A West Peterson Ave, Chicago, IL, 60659

(Tel) 773.506.9158 (Fax) 773.506.9159
www.chicagokrcc.org / krcc@chicagokrcc.org

financial inability to pay unreasonable and unaffordable high fees should not be the roadblock to the pathway for a legal permanent resident to become a U.S. citizen. It is their American Dream and their right.

Many of the immigrants and refugees we work with on a daily basis already struggle to pay immigration fees. The steep increases proposed by USCIS, which in some cases double the current fee, would put the goals of gaining permanent resident status, reuniting with family members, and ultimately becoming a US citizen farther out of reach. USCIS should be building bridges for immigrants to move toward citizenship, not putting up walls.

The proposed fee for naturalization is particularly jarring. As recently as 1998, the cost to apply for citizenship was \$95. In 2002, after the Bush Administration took office, the costs (including biometric fees) went up from \$250 to \$310. The total fees are now \$400, a fourfold increase in the past eight years. Now USCIS is proposing a further increase of 70%, to \$675. An immigrant working at a minimum-wage job would need to work for more than three weeks and save all of his earnings in order to pay this fee.

Even more startling is the proposed cost of filing for adjustment of status, which for many immigrants is the first step on the road leading to US citizenship. That application has risen from \$130 in 1998 to \$325 today, plus \$75 for biometrics. Under the proposed rule, the price will rise to \$905 plus \$80 for biometrics. In other words, it will cost nearly \$1,000 for an immigrant to get a green card and start the five-year countdown to citizenship. A minimum-wage immigrant worker would need to save a full month's pay to afford the proposed fee.

One of our clients, who recently obtained citizenship through our NAI program, has been a pastor at a small Korean church since he immigrated here. His church was small, and his salary did not allow room to apply to become a permanent resident. In the end, his church members saved up money and paid for his processing fees; he finally received his permanent resident status in 1990. After realizing that he is ineligible for many of the benefits offered by the U.S.

미주한인봉사교육단체협의회 가입단체 (NAKASEC)
A local affiliate of the National Korean American Service and Education Consortium,
Inc.

Korean American Resource & Cultural Center
2701-A West Peterson Ave, Chicago, IL, 60659

(Tel) 773.506.9158 (Fax) 773.506.9159
www.chicagokrcc.org / krcc@chicagokrcc.org

government, he wished to apply for citizenship but did not have the money to hire a lawyer. So he delayed applying for more than ten years.

This is just one sample case of KRCC's clients. There are many other eligible Korean immigrants who have to either wait many years or sacrifice daily living necessities in order to apply for citizenship or other immigration related applications. Then they go through the same long, saving up process to have their spouse and children apply as well. It is simply inhumane to increase fees on all applications knowing that majority of applicants cannot afford the fees.

USCIS claims that the fee increase is necessary to improve service. USCIS definitely needs to improve service, as shown by the continuing backlogs in application processing and the months-long (even years-long) delays caused by security checks. Last October, the Government Accountability Office reported that the agency had lost track of 110,000 files needed to process citizenship cases. One of KRCC's clients applied for citizenship last September; she went for fingerprinting in early October. However, she hadn't received anything from USCIS. She missed work to come to KRCC where she had to wait about 2 hours to find out that USCIS couldn't do anything to help her case. She requested for an appointment with an immigrations officer, meaning she'll have to miss another day of work. It has been more than 5 months, since her fingerprinting date, without any information on her case status.

~~There was another similar case. His citizenship application began processing in middle of~~ August. He called KRCC many times wondering why a fingerprint notice hasn't been mailed to him yet. The only response we received from USCIS was that he had to wait and the notice will come, that there was nothing they can help him with. He received his fingerprint notice in February, 6 months after his application began processing in August. For these and similar cases, there is nothing the applicants or agencies like KRCC can do, not even to find out exactly what is happening with the case. Only choice left for anyone is to wait and wait. We applaud USCIS's efforts to improve service. We nevertheless believe that the burden of paying for such improvements should not rest solely with immigrants who are already struggling to pay agency costs and receiving poor service.

미주한인봉사교육단체협의회 가입단체 (NAKASEC)
A local affiliate of the National Korean American Service and Education Consortium,
Inc.

Korean American Resource & Cultural Center
2701-A West Peterson Ave, Chicago, IL, 60659

(Tel) 773.506.9158 (Fax) 773.506.9159
www.chicagokrcc.org / krcc@chicagokrcc.org

USCIS also argues that it has no other option than raising fees if it wants to cover its costs. In fact, there are no laws that require USCIS to fund all of its operations through fees. Nothing prevents USCIS from pursuing other sources of revenue, including asking Congress for appropriations. Indeed, USCIS has sought and received Congressional funding several times in the past

Most basically, immigration and citizenship are public goods that benefit our entire country and that we as a nation should help pay for. Immigrants bring their talent and hard work to our economy. They pay taxes and help revitalize our communities. In becoming citizens, immigrants demonstrate their strong commitment to their new home country by learning English, gaining knowledge about American history and government, and swearing allegiance to the United States. It is little wonder that newly naturalized citizens, eager to participate in our democracy, consistently vote at higher rates than other citizens. We should be encouraging immigrants to become part of our community by gaining legal status and becoming citizens, not setting up barriers that block their path and keep them out.

For all these reasons, the proposal to increase immigration fees is misguided and counterproductive. We urge USCIS to reconsider this proposal, and to seek other sources of funding for its operations, rather than add more burdens on immigrants.

Thank you for your consideration.

Sincerely



Eun Young Lee
Citizenship and Youth Program Coordinator
The Korean American Resource & Cultural Center
2701-A W. Peterson Ave., Chicago, IL 60659
Phone) 773-506-9158
Fax) 773-506-9159

미주한인봉사교육단체협의회 가입단체 (NAKASEC)

A local affiliate of the National Korean American Service and Education Consortium,
Inc.