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Sent: Thursday, March 22, 2007 11:14 AM
To: OSComments
Subject: DHS Docket No. USCIS- 2006-0044

PUBLIC COMMENT

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Document ID: USCIS- 2006-0044

**Document Title: Adjustment of the Immigration Benefit Application
and Petition Fee Schedule**

As a non-profit, community-based organization engaged in serving refugee and immigrant newcomers to the United States for 24 years, we are responding to the proposed fee increases in the referenced document with profound dismay and strong opposition.

If implemented, the fees will become an even more onerous barrier to the achievement of America's historic and admirable traditions of welcoming newcomers; encouraging their prompt and full integration into the nation's mainstream; promoting family values and reunification; and providing support and encouragement to vulnerable populations.

For those who have been in the country for several years as hard-working, tax-paying contributors to the nation's economic and social welfare who now seek citizenship or a change in status, the fees represent a burdensome and unfair surtax not required of other taxpayers. Even though they may have begun the journey toward independence and self-sufficiency traveled by previous generations of refugees and immigrants, most of those who will be most severely impacted by the higher fees remain on the lower rungs of the economic ladder. And they have already experienced incalculable costs in suffering and hardship.

We recognize that USCIS is required under current law to collect fees adequate to fund the full cost of processing immigration and naturalization benefit applications and petitions and other services. However, as now proposed the fees are unfair, inequitable and counter-productive to other national goals and priorities of integration and self-

sufficiency of newcomers. We, therefore, urge that the law and policies be changed to respond to the need to fund the processing of immigration applications without imposing a financial burden on applicants.

We urge officials at USCIS join us in seeking Congressional action to design and implement a more effective, constructive and compassionate funding program.

A more appropriate model, we believe, would be the one that currently funds the passport program at the Department of State. Those who seek that benefit pay a modest fee, but they are not expected to pay for all administrative and operational costs.

Until the law is changed to allow—and policies changed to support—increases in Congressionally-appropriated funds to cover such costs, we urge USCIS to seek greater internal efficiencies and cost-control measures to keep currently-required fees at the lowest possible level.