

From: mail.relay@mailmanager.net [mailto:mail.relay@mailmanager.net] **On Behalf Of** Toni Maschler
Sent: Tuesday, March 27, 2007 4:32 PM
To: OS Comments
Subject: Opposing Immigration Fee Increase DHS Docket No. USCIS-2006-0044

Toni Maschler
1722 19th St. NW #203
Washington, DC 20009-1651

March 27, 2007

OS Comments

Dear OS Comments:

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

As an attorney and an American I am deeply concerned about the proposed USCIS fee increase.

I see clients every day who have postponed applying for green cards or naturalizing because of the already substantial fees.

I am deeply troubled by the size and scope of the fee increase. USCIS plans to increase citizenship fees from \$400 (\$330 application fee plus \$70 fingerprinting fee) to \$675 (\$595 application fee plus \$80 fingerprinting fee), an increase of 69 percent. It would also raise fees for 37 other immigration and naturalization petitions and applications at an average increase of 66 percent. Furthermore, it appears that the increase will take place at once rather than being spread out over a period of time.

Rapid fee hikes of such magnitude will have a disproportionate and detrimental impact on the most vulnerable immigrants, serving to prevent refugees and others still struggling to establish themselves financially from obtaining the full status to which they are entitled.

The massive and abrupt fee increase proposed by USCIS will delay or prevent aspiring Americans from becoming U.S. citizens, reuniting with their families, contributing their knowledge and skills to our economy, and settling into our society after having escaped persecution.

-A family of four LPRs who want to apply for U.S. citizenship at the same time will now have to have \$2,700 at their disposal in order to achieve their American dream together.

-A family of four which has been granted asylum in the U.S. and is applying for permanent residence will now need \$3,620 in hand in order to apply for permanent residence.

-Furthermore, asylees applying for permanent residence will be ineligible to apply for fee waivers, no matter how dire their financial situation may be, because USCIS intends to categorically eliminate fee waivers for I-485 applications for adjustment as a part of the fee increase.

-The proposal would also prohibit U.S. citizens and LPRs from requesting fee waivers on I-130 relative petitions on the grounds that the petitioners must file affidavits of support to show that they can support their beneficiaries should they be unable to do so themselves.

Although some have justified a fee increase by stating that it will lead to faster processing, this is not guaranteed. The proposal for this massive fee increase does not appear to set forth any concrete targets for improved processing time.

In addition, while an upgrade to technology and infrastructure is clearly needed, user fees should not be the sole means of funding these improvements.

I hope that the agency will work with immigrant communities, and with Congress, to develop a functioning, effective immigration system that will benefit our country as a whole.

Sincerely,

Toni Maschler