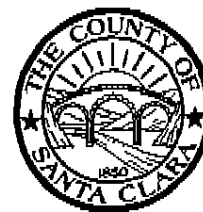


County of Santa Clara

Eleventh Floor – East Wing
70 West Hedding Street
San Jose, California 95110



FACSIMILE COVER SHEET

Date: April 2, 2007

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Comment on proposed rule DHS Docket #USCIS-2006-0044



**BOARD OF SUPERVISORS
COUNTY OF SANTA CLARA**
COUNTY GOVERNMENT CENTER, EAST WING
70 WEST HEDDING STREET, SAN JOSE, CALIFORNIA 95110 / (408) 298-8010
FAX LINE (408) 298-8460

DONALD F. GAGE

CHAIRPERSON
SUPERVISOR FIRST DISTRICT

March 29, 2007

Director, Regulatory Management Division
U.S. Citizenship and Immigration Services
Department of Homeland Security
111 Massachusetts Avenue, NW, 3rd Floor
Washington, DC 20529

**RE: DHS Docket #USCIS-2006-0044 – Proposed Rule to Adjust the Immigration
and Naturalization Benefit Application and Petition Fee Schedule – OPPOSE**

On behalf of the Board of Supervisors of Santa Clara County, I am writing to express our strong opposition to the proposal by U.S. Citizenship and Immigration Services to increase its fees. The proposed increases are substantial, especially those related to applying for citizenship and permanent residency. We urge USCIS to reconsider the proposal and seek other sources of funding for its operations.

As proposed, the fee for an Application for Naturalization would increase by 178% from \$325 to \$905, while the fee for an Application to Register Permanent Status or Adjust Status would be raised by 80%, from \$330 to \$595. When considering the actual net costs to applicants from all the proposed new fees, the average fee increases from \$264 to \$438 – a 66% increase.

Thirty-six percent of the residents in Santa Clara County are immigrants, the highest percentage among California counties. Paying significantly higher fees for USCIS services would be a considerable hardship for low-income immigrants in our county, possibly preventing them from seeking United States citizenship or permanent resident status.

In 2000-2001, when the fee for adult naturalization was \$225, 41% of lawful permanent residents who were eligible, but had not naturalized had incomes considered "low income" (below 200 percent of the poverty level). However, those who had recently naturalized had considerably higher incomes with only 28% considered low income.

DHS Docket #USCIS-2006-0044

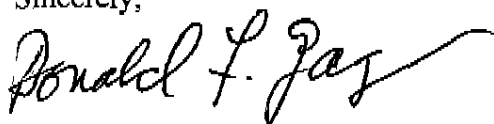
March 27, 2007

Page 2

The country experiences significant benefits from promoting citizenship or permanent residency. Citizenship allows immigrants to participate fully in the civic life of the country by permitting them to vote in elections, run for office, and serve on juries. Immigrants who become citizens of the United States take the oath of citizenship and pledge to support the values and laws of our country.

The services provided by USCIS lead to overall public benefit and therefore, the costs of the services should not fall solely on the individuals pursuing U.S. citizenship or permanent residency. USCIS should seek other funding sources, rather than overly burden one segment of our population. The County of Santa Clara strongly urges you to reconsider your proposal to increase fees.

Sincerely,



Donald F. Gage
Chairperson, Board of Supervisors

c: Santa Clara County Congressional Delegation
Santa Clara County Board of Supervisors
Peter Kutras, Jr., County Executive