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From: jol@uidaho.edu [<mailto:jol@uidaho.edu>]

Sent: Wednesday, February 28, 2007 1:22 PM

To: OSComments

Subject: DHS No. USCIS-2006-0044

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

Dear Director U.S. Citizenship and Immigration Services,

On behalf of myself, an employee of the University of Idaho, all concerned performing arts organizations and the audiences we serve, I submit these comments in response to the proposed rule published in 72 Fed. Reg. 4888-4915 (February 1, 2007) to adjust the immigration and naturalization benefit application and petition fee schedule.

I am opposed to the proposed increase of the filing fees for nonimmigrant worker petitions. The proposed increase in the Form I-129 and Form I-824 filing fees will be financially burdensome to my nonprofit performing arts organization. Before the USCIS contemplates any price increase, regular processing procedures must be improved.

USCIS should not consider a fee increase without first improving regular processing procedures in the following ways:

Reduce the maximum processing period for O and P petitions to 30 days. Receipt notices from USCIS often indicate that processing periods will range anywhere between 30 and 120 days. This time span is simply too ambiguous and lengthy to accommodate booking and presenting foreign guest artists for performances with a fixed date. To engage foreign guest artists, and more freely facilitate international cultural exchange, the nonprofit performing arts community must be able to rely upon a 30-day maximum processing period.

Improve the reliability and consistency in adjudication of O and P petitions. Current USCIS policies and practices result in inefficient processing of O and P visas - causing delay, expense, and unwarranted requests for further evidence. USCIS must implement uniform policies, procedures, and training for efficient processing of petitions.

Implement uniform policies to improve the traditional expedite service. The USCIS has made traditional expedite processing available at no additional fee to petitioners who experience an unforeseen emergency. Since implementing the Premium Process

Service, the USCIS has allowed nonprofit organizations to remain eligible for the traditional expedite. However, the standards for granting expedited processing requests are unclear. The traditional expedite is not helpful unless there are clear, uniform policies appropriately followed and administered by USCIS.

As an academic advisor in a liberal arts college and former professional actress/singer, I am fully aware of the importance of the arts in education. The immeasurable positive influences the arts have on students of all ages are sometimes/often unrecognized or ignored when educational institutions and political entities attempt to use economics as their primary standard for measuring learning outcomes. This is short sighted and unrealistic. Please do not allow finances to, once again, become a barrier to our students' opportunities to experience the broader global artistic community, which can effectively expand their potential to apply these experiences to all areas of thier education.

I am grateful for the opportunity to comment on this proposed fee increase. We oppose the proposed fee increase and urge the USCIS to demonstrably improve processing of regular petitions before burdening petitioners with any increase in processing fees.

Thank you for your consideration.

Sincerely,  
Jo Lacher  
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University of Idaho  
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Moscow, ID 83844-2436

cc:  
Senator Larry Craig  
Senator Mike Crapo