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Friday, March 16, 2007
Houghton, MI 49931

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

Regarding: DHS Docket No. USCIS-2006-0044

Dear sir or madam,

I have read your February document, "Adjustment of the Immigration and Naturalization Benefit Application and Petition Fee Schedule." Thank you for publishing this review to the general public. Moreover, thank you for taking the time to read this response.

As a citizen petitioning for entry of a remote spouse, I am keenly interested in response time improvements of the petitioning process. For more than just our case, I desire to see the response time of all petitions to improve. I believe that the proposed fee restructuring at the USCIS has inadequately addressed an Expedited Service Fee option, as is currently available with the Department of State.

As your article has indicated, the fee structure for Citizenship and Immigration Services is all "use fee" based, where the processing costs of immigration is designed to be covered entirely by the fees collected with the forms themselves, placing minimal if any impact of the general U.S. Treasury. Your fees pay for data entry, biometrics, background checking, and some infrastructure improvements.

In my current situation, I would spare no expense to expedite delivery of my wife from Northern Europe to her new home in Houghton, Michigan. No expense is too great for the rapid processing of a K-3 visa application.

As your article explains, the desire of the USCIS is to reduce a large backlog, as mandated by President Bush in 2002. It is my belief that allowing petitioners to pay an expedited service fee would naturally lend itself toward backlog reduction and backlog stability, thereby reducing complaints. Allow me to explain from a Microeconomic point of view.

Petitioners pay for the service of processing their documents. In times of high backlog, the "supply" of documents processed is low, relative to the high "demand." When these conditions occur, cost of goods would increase, balancing out with demand. If the supply is increased again, the cost of goods is reduced again.

Having an expedited service fee allows for a better balancing of backlog, where a petitioner might notice, "Wow, it might take too long for me to wait, maybe I can pay the extra expedited service fee." As this happens, you receive more fee income, allowing your department to hire more staff and improve infrastructure. At other times, a petitioner may decide that the standard fee is an adequate fee to pay, and no expedited service fee is necessary.

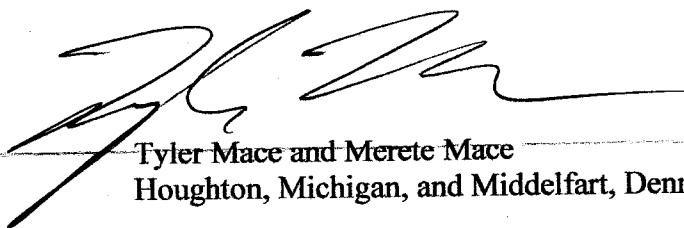
The State Department has already implemented this strategy with their Passport Application Form, Passport Re-application Form, Application for Additional Visa Pages, and their Application for Passport by Mail (renewal). As you may know, the expedited service fee is \$67 for each of these forms.

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US Citizen travelers have come to rely on these fees to make confident travel plans, as I am sure that the State Department uses these revenues to reduce backlog and make infrastructure improvements.

Last year, I myself paid this expedited service fee while renewing my passport by mail. I felt the expense was well worth the cost. Today, I have no option but to wait for the backlog to get to my forms, but writing as a citizen whose bride is thousands of miles away, I would spare no expense from the USCIS to quicken her arrival.

Thank you for reviewing your expenses and proposing changes to enhance your service. Again, thanks also for making your review public and reviewing feedback from your customers. May God bless you today in your work.!!

A handwritten signature in black ink, appearing to be a cursive representation of the names Tyler Mace and Merete Mace, written over a horizontal line.

Tyler Mace and Merete Mace
Houghton, Michigan, and Middelfart, Denmark (respectively)