

March 26, 2007

Director, Regulatory Management Division  
US Citizenship and Immigration Services  
Department of Homeland Security  
111 Massachusetts Avenue, NW, 3<sup>rd</sup> Floor  
Washington, DC 20529

**RE: DHS Docket # USCIS-2006-0044**

**~~Proposed Rule- Adjustment of the Immigration and Naturalization Benefit~~  
Application and Petition Fee Schedule**

Dear USCIS Regulatory Management Division;

Ecumenical Refugee Services (ERS) is a Denver based non-profit agency providing resettlement and immigration services to refugees and asylees. Our agency and staff are concerned with the well being of our clients and their integration into the community. We disapprove of the recently proposed increases in USCIS service fees.

These increases will discourage individuals and families from applying for immigration benefits in which they are entitled. Many of our clients are recently arrived and reside in lower income households. Current backlogs need to be reduced, but not at the expense of immigrants who are already struggling to make ends meet.

The fee increases most alarming to our agency include: I-130, I-131, I-485, N-400 and Biometrics. Although small increases may be justified, sudden increases of 80-178% are clearly unreasonable. As a nation, we need to encourage all newcomers to apply for legal status and naturalization to become active members of the community. This increase will block the path for many.

If these increases take effect, most of our clients will not be able to afford to adjust their status, file petition for alien relatives or apply for naturalization. For example, we often work with asylees. Currently they pay \$325 to adjust their status to permanent resident. With the new increases being proposed, an individual with that status would need to pay \$905. For entry-level service workers in Colorado, that is easily a month's wage. Additionally, if that asylee has family members needing to apply how will they manage to pay with their other costs of living?

Instead of raising these fees, USCIS should work with Congress to establish permanent funding for immigration services. Officials need to take into account various alternatives to detention and deportation that would be more cost effective and have less impact on communities.

On behalf of all the refugees and asylees we work with in the Denver community, we ask that you please do not enact the proposed increases.

Sincerely,



Rachel Graci  
Immigration Specialist  
Ecumenical Refugee Services  
[Rachel@ersden.org](mailto:Rachel@ersden.org)



Gordana Katardzic  
Immigration Specialist  
Ecumenical Refugee Services  
[Gordana@ersden.org](mailto:Gordana@ersden.org)