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**Sent:** Tuesday, March 27, 2007 3:19 PM  
**To:** OSComments  
**Subject:** USCIS- 2006-0044

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

The NC Refugee Advisory Council is deeply concerned about the proposed USCIS fee increase referenced above. Our member agencies include public, private non-profit and ethnic organizations that help newly arrived refugees become established community members.

We are deeply troubled by the sheer 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 NC refugee and asylee community. While refugees in NC are very eager to be economically self-sufficient and work very hard to achieve this, they are often only able to cover the necessities. The proposed fees are not something that most refugee/asylee families can manage with the limited income they are able to earn in their first 5 years in country. It is a shame that they may be forced to postpone naturalization because of the filing fees rather than be allowed to become fully integrated with the right to vote at the first opportunity.

-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.

Member agencies of the NC Refugee Advisory Council are dismayed at the proposal to eliminate fee waivers on certain applications and petitions. This action adds salt to the wound of higher fees when the option for relief is eliminated. I urge USCIS not to implement these provisions. Low income families or individuals who have experienced an economic crisis urgently need the option of fee relief available to them.

Given the speed, scope and scale of the proposed fee increase, we believe that USCIS customers must receive faster, greater, and more concrete improvements in processing times and customer service. The fee increase proposal itself does not appear to set forth any concrete targets for improvement in these areas.

Finally, we believe that certain improvements which the USCIS wants to finance through the fee increase would be better addressed through the normal budget and appropriations process. For instance, while we support USCIS's efforts to improve its fraud detection capacity and to modernize its business and technological infrastructure, we do not believe that immigrants and their families should bear the sole burden for these efforts.

In conclusion, we urge USCIS to reconsider the proposed fee increase. We hope that the agency will work with immigrant communities, and with Congress, to develop a functioning, effective immigration system that will benefit our country.

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NC Division of Social Services

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