

April 2<sup>nd</sup>, 2007

Director, Regulatory Management Division  
US Citizenship and Immigration Services  
Department of Homeland Security  
111 Massachusetts Ave. 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

On behalf of Hate Free Zone, I am writing to express our strong opposition to the increase to immigration and naturalization fees currently proposed by US Citizenship and Immigration Services (USCIS).

Hate Free Zone is an immigrant rights organization founded after September 11<sup>th</sup> to respond to increasing rates of violence and discrimination targeting immigrants of color, specifically Muslim, Sikh, Middle Eastern, and South Asian immigrants. Now in our fifth year, we continue to advance the fundamental principles of democracy and justice at the local, state, and national levels by building power within immigrant communities, in collaboration with key allies.

Our work focuses on the greater Seattle area of Washington State, a region and state experiencing substantial demographic shifts. Immigrants have played an important role in this population shift. For instance, from 1990 to 2000, Washington's foreign born population almost doubled. As a result, Washington State now has the tenth largest foreign born population in the nation. It is also ranked fourth in refugee resettlement and first in secondary migration of refugees. According to the 2005 American Community Survey, the foreign born represented 12% of Washington State's residents.

Fortunately, Seattle has the third lowest percentage of immigrants living without U.S. citizenship. This means that immigrants in Seattle have been fairly effective at gaining citizenship and fall just behind immigrants in San Francisco and New York, where only 47.3% and 49.4% (respectively) of all foreign born residents are living without citizenship. Other cities are facing much more serious situations. In Raleigh, North Carolina and Nashville, Tennessee, for example, over 70% of the foreign born population is living without citizenship. However, 58% of Washington State's foreign born are not residents.

In contrast to these high percentages of non-citizens, interest in citizenship is high. For instance, in the first three months of 2006, the Dept. of Homeland Security received 19% more applications than the same period last year. A recent study in Illinois of 793 immigrants throughout the State points to one possible explanation for this high interest in citizenship, finding that most immigrants want to become citizens in order to access better economic opportunities.

Despite this interest in citizenship, there are currently 8 million immigrants who are eligible to naturalize, but have not because of barriers. Economic forces likely play a substantial role in this startling number. For instance, un-naturalized immigrants earn less than naturalized citizens, with 50% of immigrant workers earning less than 200% of minimum wage (compared to 1/3 of native workers). In Washington State, the foreign born population living in poverty grew by 99% between 1990 and 2000. 36% earn less than \$25,000, with an average wage of \$14,000.

In the face of these significant economic burdens, the cost of citizenship and other immigration services has steadily risen over the last two decades. Despite this recent trend, the proposed fee increase of naturalization is particularly jarring. As recently as 1998, the cost to apply for citizenship was \$95. In 2002, it rose from \$250 to \$310. Current fees are now \$400, representing a fourfold increase in the past eight years. Now USCIS is proposing a further increase of 70%, to \$675.

For this reason, Hate Free Zone asks that USCIS reconsider its proposed fee increases and look to other options to improve service delivery and argue that the burden of paying for such improvements should not rest solely with immigrants who are already struggling to pay agency costs.

Sincerely,

Hate Free Zone