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Sent: Friday, March 30, 2007 1:00 PM

To: USCIS Comments

Subject: DHS Docket No. USCIS-2006-0044 - USCIS Fee Increase Comment

Dana Keeth
15 Garrison Rd
Belmont, MA 02478-4607

March 30, 2007

USCIS Comments

Dear USCIS Comments:

I am writing to you as an international educator in opposition to the February 1, 2007, proposed rule "Adjustment of the Immigration and Naturalization Benefit Application and Petition Fee Schedule." Congress and USCIS must reconsider the role of appropriated funds to meet the administrative needs of the agency.

User fees should be designed to cover the cost of processing a particular applicant's request. In the proposed rule, applicants and beneficiaries are required to bear substantial costs that are unrelated to the costs of processing their request for benefits. The United States must instead be willing to invest in the substantial infrastructure changes needed to truly meet the goals outlined in the proposed rule and supplementary material. The desired modernization, streamlining, efficiencies and security enhancements are critical. Congress must address this responsibility.

The proposed fees are exorbitant and need to be drastically reduced. In particular, attention must be given to the fees paid by the family members of principal applicants. We urge the Service to devise a more equitable model for derivative family members and we would argue that the time spent on these applications is a fraction of that spent on the principal's request.

We are grateful for the Service's numerous processing and technological enhancements made to date. Going forward, we appreciate the Service's commitment to upgrading facilities, adding and training staff, automating and modernizing processes, and reducing processing times.

Thank you for the opportunity to comment.

Sincerely,

Ms. Dana Bresee Keeth
617-489-4380

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