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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 Somali Community Center is deeply concerned about DHS Docket No. USCIS-2006-0044. The exorbitant fee increases contained in this rule would adversely affect the nation's most vulnerable immigrants.

The Somali Community Center of Nashville is a non-profit community-based organization that provides complete mutual assistance for vulnerable populations, in an ethically and financially acceptable manner serving the best interests of refugees/asylees. We have quickly become the largest refugee-operated nonprofit in Middle Tennessee, which is now home to a diverse population of refugees/asylees. We serve Somali refugees/asylees, including newly arriving Bantu, as well as Sudanese, Ethiopian, Congolese, Burundian, Rwandan, Ugandan, Cameroonian and other refugees/asylees living in the Middle Tennessee area.

We are very troubled that the proposed rule would dramatically increase the fees for filing immigration applications, while at the same time limiting fee waivers based on inability to pay. USCIS plans to increase the filing fee for I-485s (applications for permanent residence) from \$395 per person (\$325 plus the \$70 biometrics fee) to \$985 per person (\$905 plus the new \$80 biometrics fee), an increase of 69%, not including the cost of the required medical examination. USCIS also plans to increase the cost of filing N-400s (applications for citizenship) from \$400 per person (\$330 plus the biometrics fee of \$70) to \$675 per person (\$595 plus the new biometrics fee of \$80).

These increases will have a detrimental effect on our clients, whose average family size is 5 members and who work in low wage, hourly jobs. These exorbitant fee increases will delay or prevent Somalis and other vulnerable refugees, asylees and immigrants from becoming permanent residents, applying for citizenship, fully contributing to our society, and reuniting with their families after fleeing persecution in their home countries.

- A family of five who has been granted asylum in the US would need \$4,925 to apply for lawful permanent residence. This is a heavy financial burden for a family whose breadwinner is in a low wage, hourly job.
- As if this weren't enough of an increase, the proposed rule would also make it impossible to file a fee waiver along with the I-485 based on inability to pay. Even at the current fees, some of our clients are forced to save money and then belatedly apply for their immigration benefits once they have accumulated the money for the fees.
- The same family of five which has already spent a lot of money to become permanent residents would later be required to spend an additional \$3,475 to apply for citizenship. This is another heavy financial burden.
- While the U.S. government states that family reunification is an important part of the U.S. immigration program, the nearly double proposed fee hike from \$190 to \$355 for I-130 family petitions and the new prohibition on requesting fee waivers for these applications would mean that many of our clients, who were separated from their loved ones as they fled persecution in their countries, will continue to only have contact with their children and spouses via telephone. Some members of our community have seen neither their spouses nor their children in about ten years because of this separation, and the proposed law would increase these numbers.

USCIS is justifying its large fee increase for I-485s by no longer charging for interim benefits. But, it has added an additional cost to cover some interim benefits to ALL I-485s. This unfairly adds costs to those who don't need these interim benefits to help those who do need the benefits pay less. Should not a fee-based system charge each user for only the benefits that s/he uses?

While we would welcome the promised shorter processing times, should they actually result from the increased fees and not just be a result of fewer applicants, this won't help those unable to apply for immigration benefits based on the prohibitive proposed fees and the elimination of fee waivers for some commonly-filed applications.

For these reasons we urge USCIS to reconsider the proposed fee increases. We hope that USCIS will work with Congress and the immigrant communities to develop an immigration system that is fair and balanced and that does not prohibit qualified immigrants from realizing their dreams of becoming U.S. citizens and contributing to our country.

Sincerely,



Abdirizak Hassan
Executive Director
Somali Community Center of Nashville