

**HISPANIC APOSTOLATE  
IMMIGRATION LEGAL SERVICES**

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March 28, 2007

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**

Dear Sir:

The Hispanic Apostolate/Immigration Legal Services of Catholic Charities is quite saddened and concerned about the proposed USCIS fee increase referenced above. Our organization's mission is to provide hospitality, resources and trusted advice to help immigrants navigate life in the United States.

At this time, we are deeply troubled by the unconscionable fee increases that have been proposed for immigration applications. USCIS plans to increase citizenship fees from \$400 to \$675, 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 detrimental impact on the immigrant community as well as the community at large because our communities benefit from the hard work and determination of immigrants who are here legally. It is these immigrants, seeking legal benefits, that will be prevented from pursuing the possible legal avenues of relief. The massive and abrupt fee increase proposed by USCIS will delay or prevent immigrants from becoming U.S. citizens, reuniting with their families, contributing their knowledge and skills to our economy, and settling into our society, many of whom come here after having escaped persecution.

-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



**Catholic Charities**


categorically eliminate fee waivers for I-485 applications for adjustment as a part of the fee increase.

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. Furthermore, USCIS has not delivered on its past commitment to improve customer service and reduce delays. In fact, by instituting its INFOPASS system, USCIS has succeeded in limiting access, without delivering the anticipated better or more comprehensive responses to inquiries.

Finally, we believe that certain improvements which 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.

Sincerely,

  
Cynthia Fickes,  
Director