



American Council on Education
Office of the President

April 2, 2007

Director
Regulatory Management Division
U.S. Citizenship and Immigration Services
Department of Homeland Security
Washington, D.C. 20529

Re: DHS Docket No. USCIS-2006-0044

Dear Director:

On behalf of the undersigned higher education associations, I write to oppose the proposed rule, "Adjustment of the Immigration and Naturalization Benefit Application and Petition Fee Schedule," published on February 1, 2007. We believe the fee increases contained in this proposed rule are excessive, unnecessary and not in the long term interests of the United States.

American colleges and universities have long been beacons to international students from around the world. This enduring attraction benefits the United States in areas ranging from international relations to economic competitiveness. By educating the world's best and brightest, we ensure that future generations of foreign leaders have an opportunity to understand and experience American values first-hand. Moreover, we ultimately enable significant numbers of foreign-born innovators and entrepreneurs to make substantial economic contributions to the United States.

The fee increases envisioned by this proposed rule—which range from a 50 percent increase for an F to H-1B status change to a nearly 300 percent increase for an I-485 application fee for permanent residence—will have a predictably chilling effect on the number of international students coming to college in the United States. Rather than discouraging these students from attending American colleges and universities, we should be welcoming them to our campus communities.

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Accordingly, we respectfully request that the Department of Homeland Security abandon this proposed rule and base fees on the actual cost of processing applications and petitions submitted.

Sincerely,

A handwritten signature in black ink, appearing to read "David Ward", with a stylized flourish at the end.

David Ward
President

DW/mmm

On behalf of:

American Council on Education
Association of American Universities
Association of Jesuit Colleges and Universities
Hispanic Association of Colleges and Universities
National Association of College and University Business Officers
National Association of Independent Colleges and Universities
National Association of State Universities and Land-Grant Colleges
United States Student Association