

-----Original Message-----

From: Barry Johnson [<mailto:bjohnson21@fuse.net>]

Sent: Thursday, February 22, 2007 10:28 AM

To: OSComments

Subject: docket number USCIS-2006-0044-0001

I am writing to oppose the fee increase.

Currently the 171 expires after 18 months. Once that expires proposed adoptive parents must re-apply, having to pay all new fees. This to me seems too much. Why cannot the adoptive parents re-submit an application for re-renewal that addresses any changes that have occurred since the original approval. The parents adoption agency is responsible for tracking these changes and preparing home study addendums. I fully support renewed background checks, as this is very important. However the vast majority of adoptive parents do not materially change in 18 months to require a whole new application to be needed.

An application renewal, would then require less time to process by CIS staff, and thus could result in a lower fee for the parents.

As for the finger print increase, these expire after 15 months. You must have current finger prints to apply for the 171. Since the expiration dates are 3 months different, this creates confusion among adoptive parents trying to keep all the dates current.

Also, why is it necessary to be re-fingerprinted when the 15 months expire. Our fingerprints are scanned into the system, so that they can be run against the FBI files. Our fingerprints do not change, why not simply re-run the prints that are already stored. I support the renewed background checks, but having to repeat something that was already done is duplicative and unnecessary. The parents could then be charged an administrative fee to re-run the prints, again saving time for CIS staff.

This having to go be re-fingerprinted in my case is a real barrier. I live in Kentucky, about 15 miles from the Cincinnati CIS office. However since I live in Kentucky I have to drive to Louisville (100 miles one way) to be finger printed. This is a real burden in our case.

Since everything is computerized, it seems simple to be fingerprinted in Cincy, and our prints sent electronically to Louisville for processing.

Thanks you for the opportunity to comment

Barry Johnson
Alexandria, KY