

Anneke Larrance  
St. Lawrence University  
Canton, NY 13617-1475

March 6, 2007

USCIS Comments

Dear USCIS Comments:

I am an international student adviser at St. Lawrence University, a liberal arts school in upstate New York. I oppose the proposed rule ~~to~~ Adjustment of the Immigration and Naturalization Benefit Application and Petition Fee Schedule. The international students at St. Lawrence University are often here on scholarship. They are competitively selected and are of the highest academic caliber, but they do not have many resources.

The proposed fee increases will mean either that the students cannot take advantage of an opportunity to which they are legally eligible or it will cause undue financial hardship.

USCIS must reconsider the role of appropriated funds to meet the administrative needs of the agency. I ask that fees be reduced to the actual cost of processing the application or petition.

Apart from the direct impact of the excessive fees, they are contrary to clearly expressed U.S. policies. The President, the Secretary of State, and indeed the Secretary of Homeland Security have expressed clearly and often the high value that the United States places on attracting international students and scholars to this country.

The fact that USCIS operates on a fee-funded basis creates a built-in incentive to subsidize unnecessary work. This creates an incentive to requiring USCIS approval for things; that way, you can charge a fee for processing the request, which provides necessary income to finance your broader operations. The I-765 fee for Optional Practical Training is a classic example. It used to be possible for school officials designated by the INS to approve OPT in accordance with agency regulations. The benefits of reinstituting and expanding this process speak for themselves: no application, no processing, no fee, one less task to be performed by the agency, more time to devote to what the agency really needs to do. There is no obvious public policy reason for USCIS to require agency approval for OPT today. With the Student and Exchange Visitor Information System (SEVIS) now fully in place, it would be easy to devolve this responsibility back onto the schools. Yet the cost of processing this unnecessary application process continues to drive up the fee.

While I understand that USCIS is permitted by law to recover the full cost of its services through fees, and indeed has no other option so long as Congress is unwilling to appropriate funds for the operation of the agency, I ask that the fees be reduced to the actual cost of processing the application or petition. Meanwhile, I ask Congress to step up to its

responsibility for fixing the untenable situation that drives these fee increases.

Thank you for the opportunity to comment.

Sincerely,

Anneke Larrance  
315-229-5991

This message has been verified by CapwizXC as authentic and sent by this individual. Authentication ID: [05wbcjk7]

Changed message text: 63.7%