
From: Marilyn White [mailto:mjwhite@gsm.udallas.edu]
Sent: Thursday, February 01, 2007 6:46 PM
To: OSComments
Subject: USCIS-2006-0044

I want to comment specifically on the proposed increased fee for processing the I-765 as it relates to F-1 International students applying for OPT. I think this is an excessive increase for an application that requires little if any adjudication judgment. Students are eligible for OPT employment authorization by virtue of having maintained F-1 status at their respective institutions for the required period of time – a minimum of one academic year in status. Their eligibility is certified by the Designated School Official. I don't believe there is any further analysis required of the adjudicating officer.

There are many other kinds of work permits for which the I-765 is the designated application form, work permits that do require significant analysis and judgment. But OPT applications do not fall under this description. If this new fee – nearly double of the old fee – is applied to students, you are merely finding a new way to gouge a lot more money out of the thousands of students who come to the US on very tight budgets and have already spent thousands of dollars of their hard earned money on tuition at our institutions.

Marilyn J. White
Director, International Student Services
University of Dallas
1845 E. Northgate Drive
Irving, TX 75062
U.S.A.
Phone: 972-721-5059
Fax: 972-721-4011