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From: jessica.stahl@wwu.edu [<mailto:jessica.stahl@wwu.edu>]

Sent: Wednesday, February 28, 2007 3:46 PM

To: OSComments

Subject: DHS No. USCIS-2006-0044

Director Regulatory Management Division U.S. Citizenship and
Immigration
Services
Department of Homeland Security
111 Massachusetts Avenue, NW, 3rd Floor
Washington, DC 20529

Dear Director U.S. Citizenship and Immigration Services,

On behalf of Western Washington University Dance Program and the audiences we serve, I submit these comments in response to the proposed rule published in 72 Fed. Reg. 4888-4915 (February 1, 2007) to adjust the immigration and naturalization benefit application and petition fee schedule.

I am opposed to the proposed increase of the filing fees for nonimmigrant worker petitions. The proposed increase in the Form I-129 and Form I-824 filing fees will be not just financially burdensome to the WWU Dance Program, but prohibitive, preventing us from bringing cultural diversity and variety to dance at Western. Before the USCIS contemplates any price increase, regular processing procedures must be improved.

USCIS should not consider a fee increase without first improving regular processing procedures in the following ways:

Reduce the maximum processing period for O and P petitions to 30 days. Receipt notices from USCIS often indicate that processing periods will range anywhere between 30 and 120 days. This time span is simply too ambiguous and lengthy to accommodate booking and presenting foreign guest artists for performances with a fixed date. To engage foreign guest artists, and more freely facilitate international cultural exchange, the nonprofit performing arts community must be able to rely upon a 30-day maximum processing period.

Artists must make a living. They cannot be kept on hold, waiting to find out whether our program can book them or not. We must be able to communicate in a timely fashion, or they will go elsewhere.

Improve the reliability and consistency in adjudication of O and P petitions. Current USCIS policies and practices result in inefficient processing of O and P visas - causing delay, expense, and unwarranted requests for further evidence. USCIS must implement uniform policies, procedures, and training for efficient processing of petitions.

Implement uniform policies to improve the traditional expedite service. The USCIS has made traditional expedite processing available at no additional fee to petitioners who experience an unforeseen emergency. Since implementing the Premium Process Service, the USCIS has allowed nonprofit organizations to remain eligible for the traditional expedite. However, the standards for granting expedited processing requests are unclear. The traditional expedite is not helpful unless there are clear, uniform policies appropriately followed and administered by USCIS.

I am grateful for the opportunity to comment on this proposed fee increase. The WWU Dance Program opposes the proposed fee increase and urges the USCIS to demonstrably improve processing of regular petitions before burdening petitioners with any increase in processing fees.

Please consider the loss to our students, should they be unable to experience the wide range of dance presented by other countries and cultures. Already, the Arts are underfunded. Increasing financial burden will only ensure that our students' education becomes increasingly narrow.

Thank you for your consideration.

Sincerely,

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Sincerely,
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cc:
Senator Patty Murray
Representative Rick Larsen
Senator Maria Cantwell