
From: Sara Levin [mailto:Sara.Levin@Seattle.Gov]
Sent: Monday, March 26, 2007 1:25 PM
To: OSComments
Cc: Margie Viall; Maythia Airhart; Pat Wells; Shauna Larsen; Terry Light
Subject: comments on DHS Docket # USCIS-2006-0044

Attached and in the body of this e-mail are comments from the City of Seattle on the proposed adjustment of the Immigration and Naturalization Benefit Application and Petition Fee Schedule.

RE: DHS Docket # USCIS-2006-0044

Proposed rule* Adjustment of the Immigration and Naturalization Benefit Application and Petition Fee Schedule

The City of Seattle strongly opposes the increase to immigration and naturalization fees that US Citizenship and Immigration Services (USCIS) proposed on February 1, 2007. Washington State is the home to more than 750,258 immigrants from around the world and includes significant populations from Africa, Asia and Europe. Of this population, nearly 480,000 live in the Seattle metropolitan area. This immigrant population is an integral part of our community.

The City of Seattle invests significant funding on support for community-based organizations that assist eligible low-income legal permanent residents become US citizens, serving more than 1,500 people each year. Many of the immigrants and refugees we work with on a daily basis struggle to pay immigration fees. The steep increases proposed by USCIS, which in some cases double the current fee, would put the goals of gaining permanent resident status, reuniting with family members, and ultimately becoming a US citizen farther out of reach.

The proposed fee for naturalization is particularly troubling. As recently as 1998, the cost to apply for citizenship was \$95. In 2002, costs (including biometric fees) increased from \$250 to \$310. The total fees are now \$400, a fourfold increase in the past eight years. Now, USCIS is proposing to increase the fees to \$675. An immigrant working at a minimum-wage job would need to work more than three weeks and save all of his or her earnings in order to pay this fee.

We ask that the Administration work with Congress to strike the appropriate balance between user fees and appropriations. The Immigration and Nationality Act permits, but does not require, the agency to fund its costs through user fees. Immigration and citizenship are public goods that benefit our entire country. The use of appropriations to fund the work of process permits is both fair and appropriate. Immigrants bring their talent and hard work to our economy. They pay taxes and help revitalize our communities. In becoming citizens, immigrants demonstrate their strong commitment to their new home country by learning English, gaining knowledge about American history and government, and swearing allegiance to the United States. We should be encouraging immigrants to become part of our community by gaining legal status and

becoming citizens, not setting up barriers that block their path and keep them out.

In addition, we are concerned that this proposal makes seeking a fee waiver more difficult than it already is. The proposal sets up onerous requirements, making it almost impossible for those working their way through the immigration system to receive a waiver.

For these reasons, we do not support the proposal to increase immigration fees and the new fee waiver requirements. We urge USCIS to reconsider this proposal, and to work with Congress to secure appropriations to assist in funding its operations. Thank you for your consideration.

Sincerely,
Patricia McInturff, Director
City of Seattle Human Services Department