

Office of International Affairs

Post Office Box 751 503-725-4094 tel Portland, Oregon 97207-0751 503-725-5320 fax

503-725-4094 tel 503-725-5320 fax oia@pdx.edu www.oia.pdx.edu

East Hall 101 632 SW Hall

March 5, 2007

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

DHS Docket No. USCIS-2006-0044

I am submitting comments on the proposed fee increase as noticed in the February 1, 2007 edition of <u>The Federal Register</u>. Portland State University is Oregon's only international urban university. The increase filing fees will adversely affect our students, scholars, and the colleges and the departments that hire them. The filing fee for employment authorization required by international students applying for Optional Practical Training (OPT) would nearly double. A change of status filing would increase 68 percent from \$200 to \$300. Filing for an employment-based green card (I-140) will increase from \$195 to \$475.

President Daniel O. Bernstine has made internationalization of the campus a high priority. The proposed fee increase, offered without much notice to allow for sufficient planning, will present a hardship to our efforts in many ways.

- 1. At Portland State University, internationalization means inviting visiting scholars to campus to provide place-bound students an opportunity to experience different cultures from the perspectives of international faculty. This proposed fee increase will add further burden to University budgets already constrained by limited state funding.
- 2. At Portland State University, internationalization means increasing enrollments of international students who live, learn, and contribute to community side-by-side Oregon resident students. Many Oregon students are unable to have an international study experience because of work and family responsibilities. This proposed fee increase will be yet another financial hurdle for international students who may choose to study in more welcoming country.

We respectfully request that you cancel or postpone this fee increase. The current proposal will catch university departments, students, and scholars by surprise. University budgets will not have a chance to react and adjust to this increase, and vulnerable international students will have one more financial burden to bear. We believe that this increase in fees presents one more roadblock (along with SEVIS fees, security checks, more stringent visa procedures) and will present the United States in a negative light in the worldwide community. In addition to this negative economic impact, more troubling is the multiplier effect of the loss of international goodwill, the loss of the economic benefits that students provide to local companies, the loss of the research contributions that scholars provide to universities, and the loss of the overall long term benefits that the U.S. receives from having productive relationships and experiences by hosting the "best and the brightest" of the world.

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Thank you for your consideration of my request.

Vice Provost for International Affairs
Professor of Geography and International Studies