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From: scompost@juno.com [<mailto:scompost@juno.com>]

Sent: Wednesday, February 28, 2007 6:18 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,

I am an active observer of the dance world, attending as many dance performances as possible in the Seattle and Bellingham Washington area. With so much stress and distrust rampant in the world today it is critical that we in this country be exposed to groups from outside this country. Proposed increases in visa fees and poor administration are serious impediments to Americans enjoying the cultures of other countries.

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 financially burdensome to the organizations bringing dance groups from outside the US. 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.

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 oppose the proposed fee increase and urge the USCIS to demonstrably improve processing of regular petitions before burdening petitioners with any increase in processing fees.

Thank you for your consideration.

Susan Casey 3227 14th Ave W #7 Seattle WA 98119

Sincerely,  
Susan Casey  
private citizen

3227 14th Ave W #7  
Seattle, WA 98119

cc:  
Senator Patty Murray  
Representative Jim McDermott  
Senator Maria Cantwell