

David Thomas
P.O. Box 1183
Estes Park, CO 80517-1183

March 21, 2007

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

Dear Director, U.S. Citizenship and Immigration Service:

I oppose the proposed increases in USCIS service fees. Such increases will disrupt family unity, further victimize vulnerable populations, and be economically infeasible for low-income immigrants.

Please tell me how these proposed increases will further the current administration's goal of comprehensive immigration reform. Such reform must make it easier for legal migrants and immigrants to enter our country in order to provide valuable labor in jobs that most U.S. citizens simply don't want. It is important, also, that such comprehensive reform include a path to citizenship for those hard-working people who have already been living in our country without proper documents.

While I agree that service quality should be improved to eliminate the backlog and remedy misplaced cases (up to 110,000 as estimated by the GAO), this burden should not be borne solely by immigrants who are already struggling to cover agency payments. Immigrants paying these fees are law-abiding individuals who pay taxes, contribute to their communities, speak English, and know American history. We all benefit from increases in legal immigration and citizenship - economically and culturally.

I am especially concerned with the burden that the proposed increases would place on families. Families are the backbone of our society. Our immigration policies should never prevent a mother from being with her children, or a husband from joining his wife. I especially oppose all fee increases that would jeopardize family reunification, noting particularly I-129F, I-130, I-600/A, and I-187.

The integrity of families should not be sacrificed in a "business decision" - USCIS officials' justification for the fee increases. Besides, government services lack the price-control mechanisms present in competitive markets. It's essentially a non-competitive situation in which the government has a monopoly and the "customer" has no choice but to pay the increased fees.

Under this new fee structure, an individual earning minimum wage would have to save an entire month's pay in order to file an adjustment of status application (\$1,370, up from \$180). This is ridiculous! Faced with the proposed \$595 fee (up from \$330) for a naturalization application, parents should not have to choose which child can apply for citizenship versus another.

I commend USCIS for eliminating fees for certain interim benefits and initial applications for T-visas (I-914) and VAWA qualifying individuals. However, these vulnerable populations would still suffer from the proposed changes. Victims of human trafficking and gender-based violence are often in desperate financial situations. Should these increases take effect, many could not afford to adjust their status, apply for work permits, or reunify their families, and could face deportation or elongated detention.

Rather than enacting these fee increases, USCIS should work with Congress to create an alternative and permanent funding stream for immigration services. No law prohibits USCIS from diversifying its revenue through congressional appropriations, which has been accomplished in the past. Officials also should take into account various alternatives to detention and deportation that would prove more cost effective and less harmful to families and communities in the United States. For example, the program of deporting undocumented migrants back to México and other countries in Latin America by charter flights is costly. Instead, why doesn't our government work more closely with the governments of those countries, sharing the cost of returning the deportees to their homelands by regular scheduled bus service, which would be far less expensive?

In the name of families, vulnerable populations and those seeking a better life, please do not enact the proposed USCIS fee increases.

Sincerely,

David Thomas
210-857-2347