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From: themovementcollective@gmail.com

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Sent: Sunday, February 18, 2007 12:25 AM

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 The Movement Collective 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 financially burdensome
to my nonprofit performing arts organization. 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 am grateful for the opportunity to comment on this proposed fee increase. We 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.

Sincerely,
Renee Gonzalez

2 Gold St
New York, NY 10038

cc:
Representative Jerrold Nadler
Senator Charles Schumer
Senator Hillary Clinton