
From: mail.relay@mailmanager.net [mailto:mail.relay@mailmanager.net] **On Behalf Of** John Gfoeller, Esq., attorney at law
Sent: Saturday, March 24, 2007 8:11 AM
To: Director, Regulatory Management Division
Subject: DHS Docket No. USCIS--2006-0044

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March 24, 2007

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

Director, Regulatory Management Division:

Saturday, 24 March 2007

Dear USCIS,

My name is John Gfoeller, and I am an immigration attorney in Fremont, Ohio.

I am writing to strongly oppose the proposed fee increases for basic immigration services, as published in the Federal Register on 1 February 2007 (pages 4888-4915, proposed rule). They are severe; they punish the law abiding; and they reward the USCIS without requiring accountability.

The proposed fee increases are severe. For example, the filing fee for the petition for an alien relative, form I-130, would be raised from \$190 to \$355. The filing fee for the citizenship application, form N-400, would be raised from \$330 to \$595. The filing fee for the application for permanent residency, form I-485, would be raised from \$325 to \$905. These are not the only examples.

The proposed fee increases punish the law abiding. Yes, there is some fraud in the system. But, as we all know, the majority of American sponsors who use the immigration system are law abiding Americans: American spouses, American immediate relatives, and American employers. Likewise, the majority of foreign beneficiaries are also law abiding. These American citizens and their foreign beneficiaries do not deserve --and many cannot afford-- the proposed fee increases.

The proposed fee increases reward the USCIS without requiring accountability. It is not enough to say that the USCIS is a fee-based agency. At a certain point, the beneficiaries of the immigration system --American citizens as well as aliens-- simply cannot afford higher fees. I represent those people. They are usually middle class individuals or small businesses. Some of them just don't have the money to pay these increased filing fees. Others could pay the increased fees, but they and their families or businesses would be subject to real financial hardship as a result. Yet, immigration is a service that is supposed to benefit all of the American people. Therefore, the USCIS should seek increased funding from the U.S. Congress. The Congress can hold the USCIS accountable; and the USCIS should justify to the Congress why increased funding is warranted.

In closing, I ask the USCIS to maintain its current fee schedule. The proposed fee increases are severe; they punish the law abiding; and they reward the USCIS without requiring accountability. They will not help the provision of basic immigration services; they will worsen it. Please do not implement the proposed fee increases.

Respectfully yours,

John Gfoeller, Esq., attorney at law