

To whom it may concern:

I would like to add my thoughts on the proposed visa filing fee increase for Form I-129 and Form I-824. As an agent who represents foreign musicians here in the U.S. this fee increase would be nearly devastating for my business and make contracting with U.S. presenters extremely difficult. The process is ALREADY very cumbersome and expensive considering the unrealistic requirements and the usual need to expedite the visa application. These are uniquely talented artists that have achieved a level of success that enables them to perform beyond their native borders, but that success isn't always reflected monetarily. The investment of time and money in preparing U.S. visa is significant for the artist, his/her management and myself. The time and effort required on my part and often times presenters is very different than if we presented U.S. artists. Creating one more hardship such as the fee increase would very easily affect the feasibility in bringing these artists to the U.S. and have a serious impact on my business and U.S. presenters. The issue of U.S. visa difficulty has long been a source of frustration in the music community and has caused many last minute cancellations. This difficulty simply doesn't exist when my artists and U.S. artists perform in Europe and Australia. I completely understand the need for security but 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 appreciate the opportunity to comment on these fee increase proposals. The artists I represent (as well as many others) provide a unique service that cannot be measured in usual ways. These artists are not unknown (usually) and should not be considered security threats in any way. For our country to lose the exposure to international talent would be a tremendous shame, while other countries would still benefit by having reasonable procedures for foreign artists.

thank you,

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