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Sent: Tuesday, March 27, 2007 12:39 PM

To: OS Comments

Subject: DHS Docket No. USCIS-2006-0044

Patricia Hatch
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March 27, 2007

OS Comments

Dear OS Comments:

Director, Regulatory Management Division
US Citizenship and Immigration Services
Department of Homeland Security
111 Massachusetts Ave. NW, 3rd floor
Washington DC 20529.

RE: DHS Docket # USCIS-2006-0044

Proposed rule — Adjustment of the Immigration and Naturalization Benefit
Application and Petition Fee Schedule

As an individual who has spent the past 25 years working directly with immigrants, first as Director of a non-profit organization and now as a program manager at a state government refugee office, I am deeply concerned about the proposed USCIS fee increase referenced above.

I am deeply troubled by the sheer size and scope of the fee increase. USCIS plans to increase citizenship fees from \$400 (\$330 application fee plus \$70 fingerprinting fee) to \$675 (\$595 application fee plus \$80 fingerprinting fee), an increase of 69 percent. It would also raise fees for 37 other immigration and naturalization petitions and applications at an average increase of 66 percent. Furthermore, it appears that the increase will take place at once rather than being spread out over a period of time.

Rapid fee hikes of such magnitude will have a disproportionate and detrimental impact on the very immigrants whose hard work is sustaining our economy. (More than 50% of all new workers entering the American workforce are immigrants.)

The massive and abrupt fee increase proposed by USCIS will delay or prevent many immigrants from becoming U.S. citizens, reuniting with their families, contributing their knowledge and skills to our economy, and settling into our society after having escaped persecution.

-A family of four LPRs who want to apply for U.S. citizenship at the same time will now have to have \$2,700 at their disposal in order to achieve their American dream together.

-A family of four which has been granted asylum in the U.S. and is applying for permanent residence will now need \$3,620 in hand in order to apply for permanent residence.

-Furthermore, asylees applying for permanent residence will be ineligible to apply for fee waivers, no matter how dire their financial situation may be, because USCIS intends to categorically eliminate fee waivers for I-485 applications for adjustment as a part of the fee increase.

The fee hike and the blanket ban on fee waivers on certain applications and petitions would be particularly burdensome to the substantial portion of the immigrants community which lives below the poverty level - in spite of holding full-time jobs and working long hours.

In effect, these new fees will impose a MEANS TEST on U.S. citizenship, and even on adjustment of status for those we pride ourselves on having given humanitarian protection (asylees, refugees). This is contrary to the egalitarian democratic values of our nation, and abhorrent to the moral values we claim to espouse.

Given the speed, scope and scale of the proposed fee increase, I believe that USCIS customers must receive faster, greater, and more concrete improvements in processing times and customer service. The fee increase proposal itself does not appear to set forth any concrete targets and benchmarks for improvement in these areas.

Finally, I believe that certain improvements which the USCIS wants to finance through the fee increase would be better addressed through the normal budget and appropriations process. For instance, while we support USCIS's efforts to improve its fraud detection capacity and to modernize its business and technological infrastructure, I do not believe that immigrants and their families should bear the sole burden for these efforts, any more than the average native-born American seeking taxpayer services should be expected to fund technological improvements and fraud detection at agencies such as the Internal Revenue Service by paying fees over and above their taxes.

In conclusion, I urge USCIS to reconsider the proposed fee increase. I hope that the agency will work with immigrant communities, and with Congress, to develop a functioning, effective immigration system that will benefit our country and the immigrants who will play a substantial role in its future.

Sincerely,

Patricia A. Hatch
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