
From: Doug Rigby [mailto:rigbydb2@cox.net]
Sent: Monday, March 19, 2007 9:38 PM
To: OSComments
Subject: USCIS-2006-0044 Immigration Fee Increases

Summary: I understand there is pressure to increase fees, but your proposed amounts are way too steep in too short a time. Some justifications given for fee increases are blatantly unfair. This punishes immigrants trying to follow the legal pathway and will have the effect of promoting more illegal immigration.

1. Increased scrutiny and checking time obviously costs more. But this is a U.S. security decision that benefits all U.S. citizens -- therefore, they should pay for a portion of costs. Immigration petitioners (and indirectly U.S. citizen sponsors) should not bear this burden alone. It is not fair.
2. Also, additional department costs, such as refugee or asylum surcharges that have nothing to do with petitioning immigrants, should clearly NOT be borne by the fee-paying immigrants. From 8 CFR Part 103, "Since USCIS is funded from application fees, a fee waiver transfers the cost to all other fee-paying applicants." This is fundamentally unfair and there is NO justification for this practice. If the government (and general taxpayers) decide to grant asylum, or grant waivers, etc. then they must also pay for it, period.
3. Shortening processing times a couple months is no justification for increasing fees. Give me the slightly processing time and much lower fees please. Besides increasing efficiencies and automation on your end should result in reduced costs (capital equipment costs should be prorated out into the future).
4. Also, your waiver plan eligibility requirements require increased work on the petitioner end, and is in some ways is at odds with sponsorship financial requirements.
- ** 5. Most importantly, these steep fee increases will have the clear effect of discouraging rather than encouraging legal immigration. This fee increase punishes those who want to follow the legal immigrant path. Wake up people!! These fee increases will have the effect of promoting MORE illegal immigration! Please convey the implications of all this to the politicians.

Doug Rigby, U.S. Citizen and sponsor of hard-working LEGAL immigrants