

From: Knaust, Deborah M. [mailto:DMKNAUST@stthomas.edu]
Sent: Saturday, March 31, 2007 3:58 PM
To: OSComments@dhs.gov
Subject: USCIS- 2006-0044

Dear Director, Regulatory Management Division, U.S. Citizenship and Immigration Services,
Department of Homeland Security,

My name is Deborah Knaust and I am the Director of International Student Services at the University of St. Thomas in Minnesota.

In 1998, our students paid \$70 to file the form I-765 with USCIS. In 1999 they paid \$100, the years 2000 and 2002 \$120. Examples of the proposed fees include: OPT (I-765) current: **\$180**, proposed new fee: **\$340**. Change of status (I-539) current: **\$200**, proposed new fee: **\$300**. Replace lost I-94 (I-102) current: **\$160**, proposed new fee: **\$320**.

This is very upsetting because in the 2004/2005 academic year there were 8,491 international students in Minnesota. According to iie.org they spent \$172,057,746 in tuition, fees and living expenditures for themselves and their dependents. Our students must strive hard to do well in the classroom, take English language tests, jump through many academic and financial hoops and leave their families in their home countries in order to contribute to the U.S. industry and economy. At the University of St. Thomas they are 96% full-tuition paying and must meet the Financial Certification amount of \$21,000 to \$37,000 (depending on degree program) and receive no need-based scholarships.

By raising fees, it looks like the U.S. is not a welcoming place for international students. Many students feel that they are getting 'nickel and dimed'. They bring so much money to our country that is asking them to pay more for necessary processing forms seems short-sighted.

I fear that in return the U.S. will see retaliation fee hikes for our off campus studies students like the one announced last week. "**Fee Hike for International Students in Singapore**. Singapore's Ministry of Education is planning to increase fees paid by international students."

<http://www.business-standard.com/common/storypage.php?autono=273244&leftnm=6&subLeft=0&chkFlg> And why shouldn't they? The country of Ireland just changed its policy so that a student registration with the police costs 100 euros. Just last year our spring 2006 study abroad participants paid nothing. It is hard enough to encourage U.S. students to forfeit their work study money, sub-lease their apartment, save money for today's exchange rate of \$1 to .52 United Kingdom Pounds and apply for student visas. Although strong-willed students will always find a way to a global experience, added fees like Singapore's will not help my University's recruiting efforts.

Please do not dramatically increase your fees this year.

Deborah Knaust
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Education is learning what you didn't even know you didn't know.
-Daniel J. Boorstin