
From: Kerby Lovallo [mailto:kl@newworldclassics.com]
Sent: Tuesday, March 27, 2007 11:07 AM
To: OSComments
Subject: USCIS-2006-0044 Comments

Dear Sir or Madam:

Regarding the proposed fee increases for processing of visa applications - -129 Form (O & P Visa applications): currently \$190, proposed \$320
I-824 Form: currently \$200, proposed \$340.

This represents an unfair and unjustified fee increase for basic services performed slowly and sloppily by the USCIS, that are necessary for business. When the processing fees were raised the previous time, processing times went up and mistakes on the part of the USCIS went up, as well. The USCIS has done a bad job processing these visas for years – throwing money at the problem will not help.

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. 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.

Sincerely,

Kerby
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Representing Europa Galante with Fabio Biondi, I Musici from Rome, Estonian Philharmonic Chamber Choir, The Hilliard Ensemble, Rick Benjamin's Paragon Ragtime Orchestra, Shirim Klezmer Orchestra, The Mark of Zorro film with Original Score Scott Joplin's opera, Treemonisha, Zoppé – an Italian Family Circus, Rick Benjamin, Pops Conductor