

Ann Highum
Luther College
Decorah, IA 52101

March 20, 2007

USCIS Comments

Dear USCIS Comments:

I am writing to you as the dean of students at Luther College, in opposition to the February 1, 2007, proposed rule "Adjustment of the Immigration and Naturalization Benefit Application and Petition Fee Schedule." The proposed fee increases are so exorbitant they will act as a disincentive for international students and scholars to study and work in the United States. USCIS must reconsider the role of appropriated funds to meet the administrative needs of the agency. I ask that fees be reduced to the actual cost of processing the application or petition.

International students and scholars, and campus officials that employ them, file tens of thousands of petitions and applications with USCIS annually, including:

"The near-doubling of the I-765 fee for international students in F status to apply for work authorization for Optional Practical Training, from \$180 to \$340.

"The increases in the fees required in connection with change of status from F to H-1B, including the increase from \$200 to \$300 (a 50 percent increase) in the I-539 application to change nonimmigrant status for dependents and the increase from \$190 to \$320 (a 68 percent increase) in the I-129 petition for nonimmigrant worker. These fees are on top of the required data collection and fraud prevention fee, which is not part of the fee schedule.

Apart from the direct impact of the excessive fees, they are contrary to clearly expressed U.S. policies. The President, the Secretary of State, and indeed the Secretary of Homeland Security have expressed clearly and often the high value that the United States places on attracting international students and scholars to this country. The United States reaps immeasurable benefits for our foreign policy, our students' education, our economy, our competitiveness, and our public diplomacy from attracting the best and brightest minds and the next generation of world leaders to America's educational institutions.

Regrettably, the increased fees will reinforce the inefficiencies and dysfunctionalities USCIS inherited from INS when the Department of Homeland Security was created. The solution to correcting the systemic problems that plague the agency is not to keep raising fees in a futile attempt to finance a twenty-first century agency. This is not acceptable as a matter of public policy, because it prices statutory benefits out of

the reach of those who need them.

MOST IMPORTANTLY, this affects REAL STUDENTS--bright and wonderful young people who trying their very best to gain the education they deem so important and precious for their futures. I could tell you a fascinating story about each one of our 100+ international students, and the sacrifices they and their families have made for them to be able to study here at Luther. They are willing and eager to work, especially in the summer--but most will find the cost of the work permit too costly to find in their meager budgets.

While I understand that USCIS is permitted by law to recover the full cost of its services through fees, and indeed has no other option so long as Congress is unwilling to appropriate funds for the operation of the agency, I ask that the fees be reduced to the actual cost of processing the application or petition. Meanwhile, I ask Congress to step up to its responsibility for fixing the untenable situation that drives these fee increases.

Thank you for the opportunity to comment.

Sincerely,

Ann Highum
563 387-1020

This message has been verified by CapwizXC as authentic and sent by this individual. Authentication ID: [xkyqBCE5]

Changed message text: 52.0%