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

Dear Sir.

Lutheran Community Services of Southern New England (LCSSNE) strongly opposes the increase to immigration and naturalization fees that US Citizenship and Immigration Services (USCIS) proposed on February 1, 2007.

A large proportion of the immigrants and refugees with whom we work on a daily basis struggle to meet immigration fees, which they must pay in order to become contributing members of our society. These dramatic increases by USCIS would put up barriers for immigrants seeking to reunite with family members, obtain permanent residency status, and become US citizens. LCSSNE supports creating opportunities for immigrants to further contribute to our Nation while achieving their goals. These increases are extremely detrimental to these objectives.

The fee increase for naturalization and filing for adjustment status are particularly problematic, especially for low income families with many children due to the combined cost for family members.

LCSNE agrees with USCIS that it is necessary to improve service. Nonetheless, we believe that it is counterproductive to place the entire burden of paying for such improvements on the backs of immigrants struggling to pay agency costs.

There are other mechanisms through which USCIS could cover its costs. No laws require USCIS to fund its operations through fees, and no laws prevent USCIS from asking Congress for appropriations. In the past, USCIS has sought and received Congressional funding.

The benefits of legal immigration and citizenship serve our entire country. Immigrants are the engine of our economy without which many U.S. industries would collapse. Through their tax dollars and hard work, immigrants help revitalize our communities and keep our Nation's industries running. Allowing citizens a reachable path to citizenship allows them to build strong ties to their new home, to learn English, to gain knowledge of

American history and government, and to swear allegiance to the United States of America. Immigration policies should encourage immigrants to integrate into our community by gaining legal status and becoming contributing citizens, not to remain in the shadows.

For the aforementioned reasons, proposals to dramatically increase immigration fees are counterproductive and detrimental to our Nation. The Lutheran Community Services of Southern New England strongly urges USCIS to reconsider this proposal and to seek other sources of funding for its operations instead of placing additional burdens on the immigrants who are trying to become productive members of society. Thank you for your consideration.

Sincerely,

Helen Czernijewski Program Director

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