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USCIS says it needs to raise filing fees again, this time by an average of more than 65%, although fees were last raised less than 2 years ago.

In the past decade, the fees for citizenship applications have gone up fourfold, but US employer's fees associated with filing a regular H-1B petition for one new foreign worker have gone up 25-fold.

USCIS admits that its proposed fee increases will provide no short-term benefits, and in the long term, they may be able to reduce processing times by "up to" 20% some time in 2009, if at all. Yet right away, the cost of applying for permanent residence will more than double, pricing many immigrants out of the process.

It is a national embarrassment that US immigration fees continue to escalate at such astonishing rates, even as quality of service, availability of telephone contact with trained government officers, general decision quality and accountability for agency errors have declined.

Apart from the US Postal Service, USCIS may be the only federal agency that attempts to operate almost entirely on user fees, which must cover far more than services to the applicants who foot the bill. The law should be changed – specifically, Section 286(m) of the Immigration & Nationality Act, which currently requires all immigration adjudications services to be fully funded by the Examination Fees Account. This forces applicants for immigration benefits, including US employers, to pay for all services to them, and also for agency overhead costs such as administration, staffing, training and overtime, for information technologies needed to overhaul the agency's outdated systems, for enforcement and investigation activities, and for all services to asylum applicants and refugees.

The agency should be properly funded to do its job. Funding the agency's operations on the backs of immigrants, and their U.S. citizen families and employers, is an injustice our country can no longer afford.

Respectfully,

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