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From: Kristen Pursley [<mailto:Kristen.Pursley@gw.wccusd.k12.ca.us>]

Sent: Wednesday, February 28, 2007 6:22 PM

To: OSComments

Subject: USCIS fee structure adjustment proposal

Hello,

I am a Citizenship teacher in Richmond, California. I have been teaching Citizenship for 3 years. I also worked as a Citizenship counselor with a non-profit organization from 1997 to 1999. I would like to offer comments on the proposed changes to the USCIS fee structure which come from my Citizenship students, and also add some comments of my own.

Several of my Citizenship students were very concerned about how high the fees for filing the naturalization application will become after the proposed change. Most of them have already filed their applications or will be able to file before the fees go up, but Richmond is a low income community, and they were keenly aware of the hardships the new fees would impose on people like them who won't be able to file until a later date. The entire class of 20 people agreed that the fees would be too high for people who don't make much money. One woman commented that her husband already works very hard, and she was concerned that he would have to work even more to raise the extra money for the naturalization fees.

One of my students who is disabled commented that the higher fee might be a barrier to people with disabilities, who would not be able to raise the extra money.

The students also commented that no one had ever given a reason for the higher fees. I know that some reasons have been given, but I think you should know that the explanation is not reaching the people most affected by this change. They feel that it is arbitrary, or that no one has bothered to explain to them why it is happening.

The most heart-rending comments came from an older Chinese couple who have been coming to my class for about three months. They can't apply for citizenship yet because they haven't been here long enough. They won't be able to apply until July, because that is when they will have had their Lawful Permanent Resident status for 4 years and 9 months. Wisely, they decided to start the Citizenship class early because they knew it would be a struggle for them to learn all the material. They come to every class session and struggle with the English, especially the pronunciation, but are learning well.

They were very distressed when they heard about the coming fee increase, and asked me repeatedly if there was any way they could apply early to get the lower rate. I had to explain that if they applied early their applications would be invalid; the law requires that they be here a certain length of time before they can apply. They were very upset and disappointed to learn that, simply because of the fact that they happened to have arrived in the U.S. a little later than their

classmates, they would end up paying almost \$300 more to apply for naturalization.

This final comment is my own. The reason given for the fee increases is that they are needed to "enable a 20 percent reduction in average application processing times by the end of fiscal year 2009". In my recent experience, the processing times for the Citizenship application are already very satisfactory; my students frequently receive their naturalization interview appointments within 2 or 3 months of the date they file their applications. Back in the late 1990s, when there was an enormous backlog in the naturalization process and applicants were waiting one or even two years for their naturalization interviews, a rise in fees to cover the costs of streamlining the process made sense. Now, if the processing time was significantly shortened, applicants would hardly have time to study the history and government they need to learn to pass the interview. There may be other areas of the country where the process is slower, but if a busy hub of immigration activity like the San Francisco Bay Area can process naturalization applications so efficiently with the current fees, I don't see why other areas of the country can't do the same.

To sum up, a fee increase to enable a reduction in processing times for naturalization doesn't seem justified, given the already very reasonable processing times for this procedure. Also, I think my students raise a very valid point about the effects of such a fee increase on low-income people, especially older people and people with disabilities. If there must be a fee increase, it should be a much smaller one, and there should be a clear and easy process for obtaining fee reductions or fee waivers for low income, disabled and elderly applicants.

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