

-----Original Message-----

From: Rob Robbins [<mailto:rob@allianceartistmanagement.com>]

Sent: Saturday, February 24, 2007 5:20 PM

To: OSComments

Subject: USCIS-2006-0044 - Please, no fee increase!

Dear Colleague:

I have been in artist management for nearly 25 years and have watched with careful eyes the disturbing changes that have developed both in policies and in practice by the former INS through the current USCIS. It is becoming increasingly difficult for artists abroad to perform in the U.S. as acquiring visas has gone from being a tolerable inconvenience to an outright obstacle.

I submit these comments in response to the proposed rule published in 72 Fed. Reg. 4888-4915 (February 1, 2007) to adjust the immigration and naturalization benefit application and petition fee schedule.

We object to the proposed increase of the filing fees for nonimmigrant worker petitions. The proposed increase in the Form I-129 and Form I-824 filing fees will be a financial burden. Before U.S. Citizenship and Immigration Services (USCIS) contemplates any price increase, regular processing procedures must be improved.

Delays and unpredictability in visa processing have made it increasingly difficult for arts management agencies to present international artists in the United States. USCIS should not consider any fee increase without first improving regular processing procedures in the following ways:

Reduce the maximum processing period for O & P petitions to 30 days. Receipt notices from USCIS often indicate that processing periods for regular petitions 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 expedited processing available at no additional fee in cases where petitioners, through no fault of their own, experience an unforeseen emergency, and where failure to expedite the petition will result in serious harm, economically or otherwise, to the petitioner. However, the USCIS 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.

We are grateful for the opportunity to comment on this proposed fee increase. We oppose the proposed fee increase and urge the USCIS to demonstrably improve processing of regular petitions.

Thank you for your consideration.

Rob Robbins
Alliance Artist Management
(212) 304-3538 P/F
rob@allianceartistmanagement.com
www.allianceartistmanagement.com
Skype: robrobbinmusic