

To Whom it may concern:

Please find below my comments regarding the increase in USCIS Filing fees.

1. A rise in Adjustment of Status applications for asylees will seriously and negatively affect even small asylee families, who do not have the same accommodation refugee families have, such as not having to pay the filing fee, only the biometrics fee. Asylee families should be eligible for the same advantages as refugee families, since they suffered the same kind of traumas before arriving on our shores, and they have menial jobs with small salaries when they first arrive.

Furthermore, the I-485 requires other expenditures that raise the amount of money a poor asylee family must face: physical examinations by a Civil Surgeon; photographs; translation of documents. The physical examination, for example, can be \$200 per person, including for the youngest children. That fee alone often holds large asylee families from even attempting the application to adjust.

Even the postage cost is higher for a large family applying together.

2. A rise in N-400 fees will seriously and negatively affect both large refugee and large asylee families. Even at the present rate of \$400 per person, many refugee and asylee families find it difficult, if not impossible, to come up with the fees. Fee Waiver requirements are not adequately described, nor are there formal guidelines to help determine if a Waiver request is reasonable. Many of these families are afraid they will lose time if they apply for one. Therefore, many refugee and asylee families who have severe financial problems do not even attempt to apply for naturalization.

3. It is the belief of the staff at my agency that the higher fees will result in fewer applications (I-485s and N-400s), especially from the kind of applicant my agency sees. How would that situation help increase income for the USCIS? Our agency is BIA-accredited and must accept the indigent without charging any fee for our services. Even the fees we do charge must be nominal. Therefore, we get clients with very limited financial resources. We expect that we will see fewer clients once the fees are raised.

4. How will the fee increase shorten the time for background checks, one of the most common complaints I hear? Much extra time is lost, both to representatives and to the USCIS, because of the repeated requests for information from applicants who have waited a year or more without hearing anything about the adjudication of their applications.

5. What about the 800 number? Will that service be improved with more funding from increased fees? Will there be more agents answering the telephones, so that the waiting time might be reduced from the present 25 to 40 minutes? Will the people answering the calls be better trained so that they don't give out incorrect information? Will there be more USCIS agents available to help with complicated issues?

Charlotte Fox Zabusky, Director
Pittsburgh Refugee and Immigrant Assistance Center
Jewish Family and Children's Service
5743 Bartlett Street
Pittsburgh, PA 15217
412-422-7200