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Director, Regulatory Management Division
U.S. Citizenship and Immigration Services
Department of Homeland Security
111 Massachusetts Ave. NW, 3d Floor
Washington, DC 20529

Director, Regulatory Management Division:

As a paralegal working in the field of immigration law, I have significant experience with the immigration process. I am dismayed by the Service's proposal to radically increase its fees. 1. The proposal to combine EAD and AP fees with the AOS fee is a poorly thought out one, as many AOS applicants do not require EAD and AP documents. Fees for those three different applications should be kept individual and separate. 2. User fees should not fund Internal Security and Investigative Operations for the investigation of misconduct of federal workers and contract employees.... 3. The processing of FOIA requests should receive appropriate funding from the government, not from immigration-related user fees. 4. The very large fee increases proposed place a heavy financial burden on those who must utilize the Immigration Service to seek permissible benefits..namely noncitizens, authorized or unauthorized. It's important to remember that immigration law should serve economic, political and social needs of the US, not just "national security" needs. For example, universities and colleges and research institutions benefit, along with our entire economy, from foreign national students and scholars. There are sectors of the US economy that are wholly dependent on highly-skilled foreign labor, as we are not "growing our own" at the needed rates or in the needed areas, such as science, math and engineering. The increase in fees seems, admitted or not, aimed at funding border enforcement and security concerns, not at funding equally important efforts to identify undocumented immigrants to bring them out of the shadows, to fund a possible amnesty program, to possibly fund a guest worker program... Finally, the service derived from USCIS is oftentimes of such a poor quality ..and typically so combative and adversarial. The Service has not performed in such a way that justifies fee increases of this magnitude.

Sincerely,

Christie Landes
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