

From: mail.relay@mailmanager.net [mailto:mail.relay@mailmanager.net] **On Behalf Of** Mary Donny
Sent: Friday, March 30, 2007 3:15 PM
To: USCIS Comments
Subject: DHS Docket No. USCIS-2006-0044 - USCIS Fee Increase Comment

Mary Donny
201 Sage Road, Suite 100
Chapel Hill, NC 27514-6510

March 30, 2007

USCIS Comments

Dear USCIS Comments:

USCIS Proposed Fee Hikes

I am writing on behalf of the Visiting International Faculty Program (VIF) of the Center for International Education, Inc. (Exchange Visitor Program P-4-10082) regarding the proposed changes to the United States Citizenship and Immigration Services (USCIS) fees. VIF has been sponsoring international teachers to the United States since 1989 and we are the largest K-12 teacher exchange program in the United States. We seek to transform the educational experience of American students and invigorate their schools and communities by providing meaningful encounters with people from other countries. Last year we hosted 1750 teachers from 50 different countries.

We are writing regarding the proposed changes to the USCIS Fees. We are particularly concerned with the proposed fee hikes on the forms I-102 Application for Replacement/Initial Nonimmigrant Arrival/Departure Record and the I-765 Application for Employment Authorization. We object that the fees for both of these forms are being nearly doubled.

Concerning the I-102 Application for Replacement/Initial Nonimmigrant Arrival/Departure Record, the proposed increase is to raise the fee from \$160 to \$320, thereby doubling the fee. This form is used solely by those with J visas who either lose or have their passports and visas stolen. The increase in this fee is unfair because these visa holders are already in a stressful situation due to the loss of their passport and visa. Teachers in most parts of the world do not make a significant income and they should not be required to be wealthy in order to participate in the visitor exchange program. Drastically increasing this fee will have an effect on those teachers who have enough funds to cover the program and the costs related to moving but do not have a significant amount of funds to cover emergencies such as this. As the visitor exchange program aims to increase mutual understanding between peoples and cultures, it should not exclude those who lack funding. This fee increase will exacerbate the challenging situation that these teachers are already confronting.

Concerning the I-765 Application for Employment Authorization, the proposed increase is to raise the fee from \$180 to \$340, thereby almost doubling the fee. This steep increase can create a hardship on those with J-2 visas and it can prevent them from obtaining employment. This employment is not meant to provide a basic income for the family but is meant to help those with J-2 visas assimilate into the American culture. It also aims to provide both activity and stimulation for the dependant in order to avoid homesickness. The fact that a dependent can work is in fact one of the benefits of the J visa program. It helps to fully integrate the "alien" family into the community and it enhances the international exchange experience. Should the fee for the Application for Employment Authorization be increased to \$340, many dependents will no longer be eligible for work authorization simply due to financial reasons or will have to wait to save the money needed for this application, thus delaying the person's ability to participate in the work environment in the United States.

In summary we respectfully request that you do not double these fees. If the USCIS is simply increasing fees in order to cover costs, please consider either raising or adjusting the current fee by a much smaller amount or gradually raising the fees over a longer period of time. Thank you for allowing us this opportunity to comment on these changes.

Sincerely,

Mary Donny, Director of Government Relations
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