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Director, Regulatory Management Division U.S. Citizenship & Immigration Services Department of Homeland Security 111 Massachusetts Avenue NW, 3rd Floor Washington DC 20529

RE: Docket No. USCIS-2006-0044: Proposed Fee Increase

Dear Director,

I am writing in response to the unprecedented massive proposed fee increase for immigration and citizenship applications. While fees of course must be adjusted from time to time, the scope of this proposed increase is completely out of scale.

Moreover, the elimination of fee waivers for most applications will create undue hardship, particularly for vulnerable applicants such as battered spouses and children, and asylees. While I applaud the elimination of fees for the I-360 (Battered Spouse Self-Petition) and the continuing policy of not charging a fee for Form I-589 (Asylum Application), I question the sense of eliminating fee waivers across the board for Form I-485. The complete elimination of access to a fee waiver for the I-485 will put permanent resident status out of reach for the very people you claim to be trying to help: survivors of domestic violence and persecution. I urge you to continue the current policy of allowing fee waiver requests to be evaluated on a case-by-case basis.

I further urge you to reconsider the scale of the fee increase, and to consider charging on a FLAT-FEE basis. The advantages of the flat-fee basis include:

- eliminate unnecessary errors on writing check
- easy for applicant to calculate and budget accordingly
- easy for government to estimate revenues to be received
- over time, the cost of each form will balance out
- increase overall efficiency

If you feel that operating expenses are so far above revenue, please request supplemental appropriations from Congress for current and future fiscal years.

While it is reasonable to raise fees as costs rise, it is not fair to burden the general public with such massive increase for the services and benefits our government is supposed to provide.

Thank you for your consideration.

Respectfully yours,

VIRGINIA K SUNG