

**The North American
Traveling Musicians
Union**



U.S. Citizenship and Immigration Services,
Ur M. Jaddou, Director
US Citizenship and Immigration Services
20 Massachusetts Avenue NW
Washington, DC. 20001

Re: Docket No. USCIS 2021-0010
Via Online Federal Register

February 22, 2023

To Whom It May Concern:

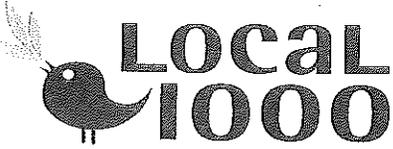
I am the President of Local 1000 of the American Federation of Musicians. We are a travelling musician's union with over 300 members in the U.S. and Canada. Our members make their living as touring performers, mostly playing acoustic folk and roots music.

We recently learned The Department of Homeland Security (DHS) has proposed substantially increasing fees on P and O visas for international guest artists performing in the United States, by up to 260% for the O classification (from \$460 to \$1655), and by up to 251% for the P Classification (from \$460 to \$1615).

We strongly urge the Department of Homeland Security to reject these proposals as they represent an undue burden on our Canadian members. They will also adversely affect our U.S. members by depriving them of cultural exchange with musicians from other places; and they will have a negative financial impact on the cultural sector in the United States as a whole.

Our members are independent musicians who mostly perform at small venues across Canada and the United States. Canadian members who tour in the U.S. typically book their own engagements—solo or small combo tours that bring their unique music to audiences in towns across this country. Although it is challenging, it is possible to organize successful tours at this level, but the margins are extremely tight. The increases being proposed will make U.S. tours all but impossible for the independent musicians we serve, and will hamper their ability to grow their careers and make a living from their music.

These changes will also have a negative impact on our U.S. members. The acoustic music scene we serve is a vibrant cross-border community that thrives on mutual exchange, and our U.S. members benefit from frequent exposure and collaboration with their colleagues from Canada. By restricting the availability of touring opportunities to Canadian musicians, the USCIS will be hurting musicians in the United States who often gain concrete professional and creative opportunities (such as concert or festival co-bills, recording and touring opportunities,



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songwriting collaborations, etc.) that occur when musicians are able to easily work across borders.

The proposed increases will also stifle the entire performing arts sector, which similarly prospers with the free exchange of culture across borders. Venues across the U.S. from tiny house concerts to large performing arts centers pride themselves on offering diverse and exciting programming regardless of where it comes from. That is how they build their audiences and create dynamic cultural scenes in cities and towns all over this country. The large fee increases currently being proposed will have a direct negative impact on cultural programming and hinder arts organizations' ability to attract audiences, which will put U.S. jobs at risk and have a negative ripple effect in many communities across this country. In short, the proposals put forward by the DHS and the USCIS will only harm the U.S. economy.

In conclusion, we believe the proposed changes will be bad for our Canadian and U.S. members, and bad for the cultural sector in general. We urge you to turn down this request down.

Sincerely,

Aaron Fowler
President, AFM Local 1000

CC: Liana White, Executive Director, Canadian Federation of Musicians
Ray Hair, American Federation of Musicians International President
Alfonso Pollard, AFM Legislative-Political Director, Director of Diversity
Chuck Schumer, NY State Senator
Kisrten Gillibrand, NY State Senator
Jerry Nadler, NY Representative



U.S. Citizenship
and Immigration
Services

April 3, 2023

Aaron Fowler
President, AFM Local 100
1501 Broadway, 9th Floor
New York, NY 10036

Dear Mr. Fowler:

Thank you for your February 22, 2023 letter requesting reconsideration of the proposed U.S. Citizenship and Immigration Services (USCIS) fee increases for O and P visas.

We appreciate your statements about the cultural and economic importance of artists and arts organizations and your concerns about the impact of USCIS fees on these stakeholders.

USCIS fee structures are set to ensure we fully recover all of the agency's costs. As you know, USCIS is primarily fee funded with 96% of our budget covered by fees. At the same time, USCIS administers certain immigration benefits without collecting a fee (e.g. refugee and asylum processing, as well as fee waivers for those economically disadvantaged and certain victims, etc.). To cover the costs of doing this important work to support the nation's ideals and interests, the vast majority unappropriated by Congress, USCIS must charge other fee-paying applicants and petitioners. In an effort to reduce the need for large fee increases, the President's FY 2024 budget request for USCIS seeks appropriated funding to support the processing of refugee and asylum applications, as well as backlog reduction and other key priorities.

Your input regarding O and P visa fees in the proposed fee rule is very important to us. The public comment period ended on March 13, 2023, and USCIS will carefully review all public comments as we draft a final fee rule.

Thank you again for your letter. Should you require any additional assistance, please do not hesitate to contact me.

Respectfully,

A handwritten signature in black ink that reads "Ur M. Jaddou" followed by a long horizontal flourish.

Ur M. Jaddou
Director