



March 9, 2023

Samantha Deshomees, Chief
Regulatory Coordination Division
Office of Policy and Strategy
US Citizenship and Immigration Services
Department of Homeland Security
20 Massachusetts Avenue NW, Mailstop #2140
Washington, DC 20529-2140

Dear Ms. Samantha Deshommes,

This letter provides the comments on the U.S. Citizenship and Immigration Services proposed rule Docket RIN: 1615-AC68 as it pertains to increased USCIS fees.

The American Sheep Industry Association (ASI) is the national trade organization representing the interests of the over 90,000 sheep ranchers located throughout the country. Our industry depends on H-2A shepherders for the care and protection of fully one-third of all sheep in America.

ASI strongly opposes the fee increase of 137% from \$460 to \$1,090 on named 1-129 applications and for unnamed petitions, an increase of 15% from \$460 to \$530. We understand the proposal does not account for the additional \$600 asylum petition which explodes the increased costs by 267% and 146% respectively.

The sustainability of America's ranches to afford the wage, food, and housing expenses as well as fees to employ H-2A workers is in danger. Loss of the workers due to excessive cost will result in the dispersal of the sheep on ranches and the corresponding loss of lamb and wool production.

The American wool industry has endured several challenges in recent years which has adversely impacted American sheep producers. China's tariff retaliation on American wool coupled with the ensuing global pandemic crippled the American wool market due to loss of market access and processing infrastructure, while drastically altering consumer demand for wool apparel. The wool market has not returned to pre-pandemic prices and producers are faced with high production costs and inflation. In fact, an entire year's worth of wool production remains unsold this winter which is contributing to low wool prices.

Prices for lambs at the ranch gate have been seriously depressed for nearly a year. Many of the sheep producers employing H-2A shepherders were unable to receive bids for their lambs or had to sell their lambs at prices that were more than 50% lower than offered in 2021. The costs of feed, fuel and supplies continue to be at record highs while severe drought conditions have

limited forage availability. Returns to sheep and wool producers are not sufficient to cover production expenses. The proposed USCIS fees will no doubt further stress the ability of sheep operations to continue and impact the sustainability of the American sheep and wool industry.

We appreciate the opportunity to submit comments regarding this new fee proposal and USCIS's consideration of the information provided on the risks to U.S. sheep and wool production due to increasing costs.

Sincerely,

A handwritten signature in black ink that reads "Brad Boner". The signature is written in a cursive, slightly slanted style.

Brad Boner
American Sheep Industry Association