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**To:** USCISFRComment@dhs.gov  
**Subject:** OMB Control Number 1615-0047

Greetings, Sunday Aigbe:

I write to you regarding the redesign of the extremely important Form I-9, which is the main protection American jobs have from unauthorized workers (or illegal aliens.) I do so on behalf of the Center for Immigration Studies, where I am a Fellow; CIS is a nonprofit, nonpartisan think tank, headquartered in Washington, which examines the impact of international migration on American systems. We are pro-immigrant but opposed to the exploitation of workers of all kinds, aliens and legal residents.

The I-9 should be redesigned so that it encourages complete and honest responses from the 70 million or so workers who use it each year. It should clearly state its mission, which is to sort out authorized workers from unauthorized ones. There are other, lesser, corrections that need to be included.

I make one major, and four minor recommendations, as follows:

1. The objective of the form is to keep illegal immigrants out of the labor market; you cannot tell that from its current text. Further, the principal users of the form are workers, yet the bold copy at the head of the form is a message to employers, about not asking too many questions of their workers.

The major recommendation is that be changed. The opening message in bold should be something like this:

***"Workers: this form is designed to preserve American jobs for authorized residents of the U.S., so please help by filing it out carefully and honestly. Employers: read the instructions and handle this document in such a way as not to endanger the rights of any of your workers."***

The suggested text fits easily within the available space.

The other four suggestions:

2. Add a space for a telephone number wherever there is a name. This will both give the document more immediacy and will make it easier for an employer or a government official to contact the worker to ask questions. This can be done by a little squeezing of the form.

3. I would suggest that your ultimate supervisor, the Secretary of DHS, is a very modern person and would not want the out-of-date, mildly sexist term "maiden name" to be used in Section 1 and that she would prefer something like "birth name if different." Ask her!

4. I would reorder the four categories of people authorized to work in the U.S., further down in Section 1, to put the obscure "noncitizen national" in the bottom row. After all, IRCA does not apply to American Samoa where the bulk of these Nationals live. Placing the category, as it is now, between citizen and LPR, just invites confusion.

5. Speaking of distant places, box 6 in List A (acceptable documents) is incorrect. Persons bearing a passport from the Republic of Palau (PW) should be added to those from FSM and RMI. People from Palau can work in the U.S. legally, as more or less permanent nonimmigrants, as can people from FSM and RMI. The legal citation is P.L. 99-658, section 141. In some government documents the abbreviation is RP; you can avoid the initials problem by not using abbreviations for any of these Associated States.

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