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Department of Homeland Security
U.S. Citizenship and Immigration Services
Office of Policy and Strategy
Chief, Regulatory Coordination Division
20 Massachusetts Avenue, NW
Washington, DC 20529-2020

Submitted via : www.regulations.gov
e-Docket ID Number: USCIS-2008-0020

**Re: 60-Day Notice of Information Collection: Revision of a
Currently Approved Collection—Form I-600, Petition to
Classify Orphan as an Immediate Relative; Form I-600A,
Application for Advance Processing of Orphan Petition; and
Supplement 1, Listing of Adult Member of the Household
OMB Control No. 1615-0028
77 Fed. Reg. 65709 (Oct. 30, 2012)**

Dear Regulatory Coordination Division Chief:

The American Immigration Lawyers Association (AILA) submits the following comments in response to the above-referenced Department of Homeland Security's (DHS) Notice of Information Collection, published in the Federal Register on October 30, 2012.

AILA is a voluntary bar association of more than 12,000 attorneys and law professors practicing, researching, and teaching in the field of immigration and nationality law. The organization has been in existence since 1946. Our mission includes the advancement of the law pertaining to immigration and nationality and the facilitation of justice in the field. AILA members regularly advise and represent businesses, U.S. citizens, U.S. lawful permanent residents, and foreign nationals regarding the application and interpretation of U.S. immigration laws. We appreciate the opportunity to comment on the Notice of Information Collection and believe that our members' collective expertise provides experience that makes us particularly well-qualified to offer views on this matter.

Form I-600 Instructions

The stated purpose of the revisions of the Form I-600 instructions is to "clarify language regarding combination filings and biometric services fees for those petitioners living abroad." Thus, substantial changes have been made to the instructions.

On the whole, the proposed revisions of the instructions accomplish the stated purpose. The revised instructions are more detailed and provide substantial improvements to explain not only how to complete the form but also clarify what information is solicited from the applicant(s) completing the form.

Form I-600A Instructions

The stated purpose of the proposed revisions being made to the Form I-600A instructions is to “insert clarifying language to make them more customer-friendly and easier to understand.” Often it is a daunting task for the government to make instructions and forms “more customer-friendly and easier to understand” but it appears that the Service has done an admirable job in its effort to attain this goal. The proposed revisions do provide additional information and clarity that should enable the person to better understand what is needed, thus allowing the person to complete the form more quickly and accurately.

Form I-600A/I-600, Supplement 1

The new form is entitled Form I-600A/I-600, Supplement 1, Listing of Adult Members of the Household. This form will be required to accompany both the Form I-600 and Form I-600A. The purpose of the Supplement 1 is to obtain information about “any person age 18 or older who is a member of the adopting parent(s) household on or before the date the Form I-600A or Form I-600 is filed and whose principal or only residence is in the home of the prospective adoptive parents.” The new form creates a more formal method for collecting information on such household members.

The furnishing of biometrics for household members is a worthwhile requirement considering the importance of the future safety and well-being of the adopted child. Requiring the biometrics of all adults living in the household greatly enhances the ability to protect the child. Thus, the added form is a helpful tool in collecting information about such individuals.

Conclusion

We appreciate this opportunity to comment on this information collection.

Sincerely,

THE AMERICAN IMMIGRATION LAWYERS ASSOCIATION