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Agency Information Collection Activities: Application To Register Permanent Residence or Adjust Status, Form I-485 and Supplements A, C, and E

Comment On: USCIS-2009-0020-0067

Agency Information Collection Activities: Application To Register Permanent Residence or Adjust Status, Form I- 485 Supplement A, and Instruction Booklet for Filing Form I- 485 and Supplement A, Form I- 485; Revision of a Currently Approved Collection

Document: USCIS-2009-0020-DRAFT-0070

Incomplete Comment Submitted by J. Charles Ferrari

Submitter Information

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General Comment

See attached file. Space provided on line is not enough.

Attachments

Incomplete Comment Submitted by J. Charles Ferrari (Attachment)

For reasons known only to the agency, the agency has declared war on the environment and on the people it serves. It has done so by unnecessarily bloating its forms -- there have been no changes to the

law that require the bloated forms -- and by making it as onerous as possible to complete said forms.

We begin with the Instruction Booklet for Filing Form I-485 and Supplement A.

Delete all "This Page Intentionally Left Blank" pages. They just waste paper.
Start the content of Page 2 on Page 1. There is more than sufficient space of page 1 to do so.

Start the instructions in the available space on Page 5. Don't waste paper.

Form I-485 Supplement A

Combine the "Street Number and Name", "Apt", "Ste", "Flr" and "Number" fields. Separating these fields only contributes to increasing the burden on the applicant and to the waste of paper. Surely the agency has qualified programmers who can split this information up, if that is what the agency's databases require. And, there is no plausible reason why said databases should require the splitting of what is one line per the US Postal Service's standards.

Either delete items 2 and 7, or remove the requirement that a G-28 be filed with the form. Reduce the unnecessary waste of paper, the bloat of the form -- going from 2 pages to 4 -- and reduce the burden on your users.

Form I-485

Either remove the "To be complete by an attorney or accredited representative (if any)" block, or remove the requirement that a G-28 be filed.

Reduce the unnecessary waste of paper, the bloat of the form and reduce the burden on your users.

In all instances where an address is required, combine the "Street Number and Name", "Apt", "Ste", "Flr" and "Number" fields. Separating these fields only contributes to increasing the burden on the applicant and to the waste of paper.

Surely the agency has qualified programmers who can split this information up, if that is what the agency's databases require. And, there is no plausible reason why said databases should require the splitting of what is one line per the US Postal Service's standards.

In item 23, move the input box up in line with the question. There is ample room to the right of the question for the input box. Reduce the waste of paper.

Clarify that a G-325A is no longer required.

Remove Part 2, Item 1.B. It is duplicative of Part 2, Item 3 and unnecessary for 245(i).

Remove Part 2, Item 2.B. It is duplicative of Part 2, Item 3

Combine Items 4.a, and 4.b with items 5.d. and 5.e in Part 2. Reduce the waste of paper. Having these items separate does

not contribute to clarity. It only contributes to the form bloat.

Part 4, item 4.b. add "(if any)."

Remove Part 4, item 5.b. It is irrelevant and potentially unknowable. Once the marital relationship ended, it is entirely possible that contact ceased and therefore it is not possible for the applicant to know what the former spouse's immigration status is.

Remove Part 4, Items 5.C, 5.D., and 5.E. They are not relevant.

Remove Part 4, item 7. How the spouse became a US citizen is irrelevant. What is relevant is that the spouse is a US citizen, which is fully covered by Part 4, Item 6.

Remove Part 4, Items 11.B, 11.C, 11.D and 11.E. They are all irrelevant and at least 11.B is unknowable.

Part 5, remove the "What is your child's relationship to you?" blocks. It is irrelevant whether the child is a biological child, a step child, or an adopted child. A Child is a child under the INA. Don't contribute to discrimination.

Remove Part 6 in its entirety.

Ethnicity is irrelevant, particularly when limited to two choices. There is only one race, the human race. Height and weight are irrelevant to the adjudication of an I-485. Eye color and hair color are mutable. They both are irrelevant to the adjudication of an I-485 and provide really no assistance in identifying a person.

Part 7, Items 11.b thru d are only relevant if item 11.a is "yes." Indicate so.

Part 7, Item 12. define "abused."

Remove Part 7, Item 25. Two reasons: 1) it is irrelevant to the application, and 2) it is not something that is guaranteed to be within the knowledge of the applicant. The applicant has no control over what the applicant's spouse or parents do.

Remove Part 7, item 35 for the same reasons as Item 25 above.

Remove Part 7, item 41 for the same reasons.

Remove Part 7, item 46. I am an experienced attorney and have no idea what the agency means by "adverse foreign policy consequences" and can imagine many constitutionally protected actions that could have adverse foreign policy consequences including but not limited to writing an op-ed, writing to foreign dignitaries, travelling, etc. The question is too broad and ambiguous.

Remove Part 7, Item 50.C. for the same reasons as item 46.

Remove Part 7, Item 54. It requires a prediction of the future, something that is impossible and unknowable.

Part 10, item 2.

Either remove the item or delete the requirement that a G-28 be filed with the form. Reduce the unnecessary waste of paper, the bloat of the form and reduce the burden on your users.

Part 12, item 7.B.

Either remove the item or delete the requirement that a G-28 be filed with the form. Reduce the unnecessary waste of paper, the bloat of the form and reduce the burden on your users.

Part 12, Item 7.A.

encourages the unlawful practice of law, and places immigrant at risk of being defrauded by