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Sent: Tuesday, May 31, 2016 7:00 PM
To: USCISFRComment@uscis.dhs.gov
Subject: Comment Submission: OMB Control Number 1615-0023, USCIS Docket ID USCIS-2009-0020

Dear Sir or Madam,

We are immigration counsel for Intel Corporation, On behalf of Intel Immigration Manager, Margie Jones, we submit the attached comments in connection with the proposed changes to Form I-485. Thank you for this opportunity to provide feedback on this important matter.

Sincerely,
Michelle Park
on behalf of Margie Jones and Intel Corporation

Michelle Park | Associate



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May 31, 2016

Via E-mail: USCISFRComment@uscis.dhs.gov

United States Citizenship and Immigration Services
Office of Policy and Strategy
Regulatory Coordination Division
20 Massachusetts Avenue NW.
Washington, DC 20529-2140

RE: Application To Register Permanent Residence or Adjust Status, Form I-485, and Adjustment of Status Under Section 245(i), Supplement A to Form I-485; Revision of a Currently Approved Collection

OMB Control #: 1615-0023
Docket ID: USCIS-2009-0020

Dear Sir or Madam:

Intel Corporation (Intel) appreciates the opportunity to submit these comments with regard to the proposed revisions of the Form I-485. Intel participates in the Council for Global Immigration (CFGII) and also supports the comments it is providing about the construction of Form I-485 and other topics.

Intel is a cornerstone of America's world leadership in high technology. Among many other things, Intel builds the tiny "engines" that power almost every type of intelligent electronic device on the planet. It was integral to the development of Silicon Valley and has gone on to create countless high-tech jobs across the country for Americans, but the company's dynamism and growth requires also hiring highly educated and talented foreign nationals. Intel sponsors nearly all foreign nationals it hires for permanent residence resulting in an average of 1000 Adjustment of Status (AOS) filings each year.

Simplify Form I-485 By Removing Unnecessary Questions and Reformatting for Space and Clarity

The proposed changes to Form I-485 create an unnecessarily detailed and complex form that do not do enough to elicit meaningful information from the applicant in a more efficient manner as intended by the USCIS. Further, while incorporation of the Form G-325A may be a legitimate reason for lengthening the form, doing so will actually leave less room for applicants to supply information while still increasing Form I-485 by about 5 pages just for these questions alone. Thus, we recommend the following actions:

1. **Amending Part 2, Application Type or Filing Category** – We recommend reducing this section by moving these categories into the instructions and

assigning each a category with a number similar to how the Form I-765 solicits eligibility criteria information (e.g, (c)(9) AOS applicant as basis for EAD). We also fully support CFGI's recommendation that separate sets of instructions be produced for each category. This would be an effective method of informing applicants and form preparers of the exact requirements and information needed for each category.

2. **Remove Part 4, Information About Your Parents** – As previously commented by several organizations, information about the applicant's parents is unnecessary for the adjudication of Form I-485 and creates an additional burden toward form preparation since many foreign nationals may not know or have this information readily available for various reasons. Currently, in cases where these questions cannot be answered, they are left blank. Thus we recommend this section be removed.
3. **Remove Part 7, Biographic Information** – This information is unnecessary to the adjudication of the Form I-485 and should be removed.
4. **Reformat Part 2 through Part 6 (Pages 4-8)** – Currently, Form G-325A consists of 1 page that effectively solicits information that takes the proposed Form I-485 5 pages to solicit. Furthermore, in the proposed revisions to Form I-485, the residential address and employer sections allow for only 2 entries each instead of 5 like the current Form G-325A.

The instructions show that Part 13 was added to provide more room for additional information. However, Part 13 only allows for 5 additional slots for additional information for **any** question on the Form I-485. Thus, if an applicant must add additional addresses, employers, but must also provide explanations to any of the other questions on the form, the final form submission may easily outgrow the 18 pages that the USCIS has estimated. Realistically, many foreign workers who continue to wait for their priority dates to become current change home addresses and/or jobs several times before they are eligible to file Form I-485. The proposed changes to these sections will undoubtedly increase form preparation by an alarming rate. For a company of Intel's size filing an average of 1000 AOS applications per year, this could have the potential of increasing form processing by **hundreds** of hours.

Thus, we recommend that Pages 4-8 be reformatted to mimic the current format of the G-325A as much as reasonably possible in order to save space and reduce the likelihood of having to add multiple addendums to the form.

Intel supports and appreciates USCIS's effort to streamline the AOS process and thanks the agency again for allowing us the opportunity to submit recommendations for consideration.

Sincerely,

A handwritten signature in blue ink that reads "Margie Jones" with a stylized flourish at the end.

Margie Jones
Immigration Manager