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## Comment Submitted by William Stevens

The is a Comment on the **U.S. Citizenship and Immigration Services (USCIS) Notice: Agency Information Collection Activities; Revision of a Currently Approved Collection: Application for Replacement/Initial Nonimmigrant Arrival-Departure Document**

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### Comment

First, I don't see the point of adding "legal" to Your Full Name. It is unclear precisely what a "legal" name is, and how that differs from another name. I can only assume that you are looking for the person's given name, or, if it has been changed, what it is now. That only leads to further confusion. Just ask for the full name. Ask for any other names after that, as you suggest in the rest of the change.

Second, under entry information, you can ask for "Class of Admission" but most people don't know what that means. Just ask what kind of visa or status they had on entry. You are not going to get good answers to this anyway. I've even seen other attorneys fill this out wrong (I once saw "Class of Admission" written in the box).

Third, the port of entry question is good form. Much better to get the info this way, because even if they don't know what a port of entry is, they know how they physically arrived. Use this method of collection more.

Fourth, asking to provide your name exactly as it appears is pretty pointless if the I-94 was lost. Many times, the I-94 was only a slip of paper, it has been lost or destroyed, and the applicant has no idea of exactly what was written on it. USCIS is going to have to relax a little with respect to what was written on a slip of paper that most people do not realize the importance of until far too late.

Fifth, regarding the 1.b. interpreter changes, most people do not understand what "fluent" means with regard to a language, and it seems neither does USCIS. I suggest you

contact DOS regarding language proficiencies -- and, just say something like this: "... and my answer to every question in [whatever language], a language I speak, and I fully understood everything."

Sixth, regarding the preparer, you should include some language describing who can prepare a form, other than the applicant. For the most part, with a few exceptions, it should only be an attorney or an accredited representative. I see way too many travel agents, notaries, and other improper "preparers" filling out these forms.

Also, regarding the note to attorneys about the G-28, it should not say "may need to" it should simply remind the prepare to include a G-28. Really, when would you not want the G-28?

Regarding the preparer's certification, the preparer cannot certify that the information is complete, true, and correct. There is simply no way the preparer can know that. If you want to add a new standard of due diligence for the attorneys, fine, but be clear about that, don't just stuff it in the middle of a long paragraph.