



Records Preservation & Access Committee

Federation of Genealogical Societies, National Genealogical Society,
International Association of Jewish Genealogical Societies

December 27, 2019

Samantha Deshommès, Chief
Regulatory Coordination Division
Office of Policy and Strategy
US Citizenship and Immigration Services
Department of Homeland Security
20 Massachusetts Avenue NW, Mailstop #2140
Washington, DC 20529-2140

RE: DHS Docket No. USCIS-2019-0010
USCIS Genealogy Records Program

Dear Ms. Deshommès:

I am writing on behalf of the Records Preservation and Access Committee (RPAC) in response to the Proposed Rule dated November 14, 2019 and referenced above, which if implemented, would increase the fees to access records from USCIS by an exorbitant amount. Although the proposed rule says the overall increase would be twenty-one (21%) percent, the increase to genealogists for Alien Registration Forms and some C-Files would be a 269% increase from \$65 to \$240 and a 492% increase from \$65 to \$385 for A-Files, Visa Files, Registry Files and other C-Files. Moreover, to obtain file numbers for most of the latter records, the \$240 index search fee would be required; this would represent a 381% increase from the \$130 total current cost (index search and record) to \$625. This increase is further unjustifiable because these same fees increased just three years ago.

Genealogy has been the second largest use of the internet during the current decade. During the last ten years it has been more difficult and expensive to access records through USCIS than through other repositories such as the National Archives and Records Administration (NARA).

The proposed increase raises several questions that need to be answered before any fee increase should be considered:

1. Why have A-Files of immigrants born more than 100 years ago not been transferred to NARA when the USCIS retention schedule called for them to be transferred beginning in 2009?
2. Visa Files and Registry Files have been eligible for transfer to NARA since April 2019. What are the plans for their transfer?
3. Alien Registration Forms are on microfilm at NARA. Why can't they be released for public access at NARA facilities, saving USCIS time and genealogists the higher fees?

4. Is USCIS delaying the scheduled transfer of documents to NARA just so they can generate revenue by overcharging for their services?

Genealogists are willing to pay reasonable fees for access to records. We offer several suggestions to the proposed pricing structure in the following order of preference:

1. Transfer all files eligible for transfer to the National Archives in accordance with schedules already in place where many of the records would be available for free at the National Archives or its branches.
2. Provide statistics on the average time it took to retrieve all types of USCIS files in 2018 and charge an hourly rate not to exceed \$40 per hour in increments of one-quarter hour for the time spent. We anticipate the resulting fees would be much less than proposed. It is our understanding many files have been indexed and each file should be produced within one to two hours for a total fee not to exceed \$80 which is much less than the proposed \$240 or \$385.
3. Develop and implement a plan to index older A-Files which are not part of the Central Index System (CIS) so all eligible A-files can transfer to NARA.

The Records Preservation and Access Committee (RPAC) is sponsored by the Federation of Genealogical Societies, the National Genealogical Society, and the International Association of Jewish Genealogical Societies, and supported by the Association of Professional Genealogists (APG), the Board for Certification of Genealogists (BCG), the American Society of Genealogists (ASG), and the International Commission for the Accreditation of Professional Genealogists (ICAPGen).

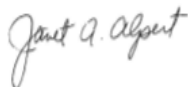
The genealogical societies and professional organizations listed above represent several thousand local, state, and regional societies, with more than 400,000 members researching family history, and over 2,000 professional and forensic genealogists. Professional and Board certified genealogists perform important work which includes tracking relatives with possible inheritable diseases; working with coroners to identify unclaimed persons; finding next of kin of unclaimed persons for repatriation of military remains; conducting heir research; proving Native American tribal membership; assisting in adoption cases; investigating land disputes; and researching oil and gas leases. As reported by Voice of America News, on September 26, 2013, "Genealogy, in fact, has become a global phenomenon. A market research firm, Global Industry Analysts, says there are more than 80 million professional and amateur genealogists around the world." Based upon recent Alexa rankings, *Ancestry.com* has 38,890 visitors a day, followed by *MyHeritage* with 11,870 and *FindAGrave* with 11,310 daily visitors per *HouseholdQuotes.co.uk*.

The undersigned 146 organizations representing 333,034 memberships across the United States, oppose the increase in fees for genealogy research proposed by US Citizenship and Immigration Services.

If you have any questions, I can be reached at janalpert@aol.com or by phone at 804-304-5874.

Sincerely,

Records Preservation and Access Committee

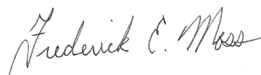


Janet A. Alpert, Chair

Federation of Genealogical Societies



Faye Stallings, President



Frederick E. Moss, JD, LLM
Counsel

International Society of Jewish Genealogical Societies



Ken Bravo
President, IAJGS Chairperson



(Mrs.) Jan Meisels Allen
IAJGS Public Records Access
Monitoring Committee

National Genealogical Society



Ben Spratling
President

cc: David S. Ferriero, Archivist of the United States, David.ferriero@nara.gov
Michael Quinn, Mike.Quinn@uscis.dhs.gov
Hon. Zoe Lofgren, Chair, Subcommittee on Immigration and Citizenship
Hon. Mitt Romney, Senator, Utah

Albuquerque Genealogical Society – 240 Members
Albuquerque New Mexico

Amelia Island Genealogic Society – 135 Members
Fernandina Beach, Florida

American Ancestors/New England Historic Genealogical Society – 272,000 Members
Boston, Massachusetts

American Society of Genealogists – 49 Members

Anne Arundel Genealogical Society – 275 Members
Glen Burnie, Maryland

Association of Professional Genealogists – 2,700 Members
Wheat Ridge, Colorado

Baltimore County Genealogy Society – 300 Members
Baltimore, Maryland

Bay Area Chinese Genealogy Group – 100 Members
Oakland, California

Bend Genealogical Society – 120 Members
Bend, Oregon

Board for Certification of Genealogists – 2,000 Members
Washington, DC

Bucks County Genealogical Society – 375 Members
Doylestown, Pennsylvania

California Genealogical Society – 950 Members
Oakland, California

Cape Cod Genealogical Society – 300 Members
Harwich, Massachusetts

Center for Jewish History – 1,250 Members
New York, New York

Central Florida Genealogical Society – 275 Members
Orlando, Florida

Central Jersey Genealogical Club – 70 Members
Hamilton, New Jersey

Centre County Genealogical Society – 135 Members
State College, Pennsylvania,

Collin County Genealogical Society – 40 Members
Plano, Texas

Colorado Council of Genealogical Societies –
Representing 2,750 Members of the Organizations Below

Adams County Genealogical Society
Eastlake, Colorado

American Historical Society of Germans from Russia
Arvada, Colorado

Aurora Genealogical Society of Colorado
Aurora, Colorado

Black Genealogy Search Group
Denver, Colorado

Boulder Genealogical Society
Boulder, Colorado

Broomfield Genealogical Society
Broomfield, Colorado

Bud Werner Memorial Library Genealogy Club
Steamboat Springs, Colorado

Castle Rock Colorado Genealogical Society
Castle Rock, Colorado

Colorado Genealogical Society
Denver, Colorado

Colorado Society of Hispanic Genealogy
Denver

Columbine Genealogical & Historical Society
Centennial, Colorado

Foothills Genealogical Society of Colorado
Lakewood, Colorado

Fore-Kin Trails Genealogical Society
Montrose, Colorado

Highlands Ranch Genealogical Society
Highlands Ranch, Colorado

Jewish Genealogy Society of Colorado
Denver, Colorado

Larimer County Genealogical Society
Fort Collins, Colorado

Longmont Genealogical Society
Longmont, Colorado

Mesa County Genealogical Society
Grand Junction, Colorado

Mountain Genealogists Society
Evergreen, Colorado

Parker Genealogical Society
Parker, Colorado

Pikes Peak Genealogical Society
Colorado Springs, Colorado

Sedgwick County Genealogical Society
Julesburg, Colorado

Southeastern Colorado Genealogical Society
Pueblo, Colorado

Swedish Genealogical Society of Colorado
Arvada, Colorado

Wales Ireland Scotland England Family History Society (W.I.S.E.)
Denver, Colorado

Weld County Genealogical Society
Greeley, Colorado

Czechoslovak Genealogical Society International – 2,215 Members
St. Paul, Minnesota

The Dallas Genealogical Society – 400 Members
Dallas, Texas

Delaware Genealogical Society – 375 Members
Wilmington, Delaware

Denton County Genealogical Society – 60 Members
Denton, Texas

Eastern Shore Public Library – Serving 500 Genealogists
Accomac, Virginia

The Englewood Genealogical Society of Florida – 100 Members
Englewood, Florida

Fairfax Genealogical Society – 500 Members
Fairfax, Virginia

Fayette County Genealogical Society – 100 Members
Uniontown, Pennsylvania

Federation of Genealogical Societies
Austin, Texas

Florida State Genealogical Society – 550 Members
Maitland, Florida

Forsyth County Genealogical Society – 150 Members
Winston Salem, North Carolina

Genealogical Federation of Long Island – 13 society organizations and 2,750 Members
Kings Park, New York

Genealogical Forum of Oregon – 1,100 Members
Portland, Oregon

Genealogical Research Institute of Virginia – 250 Members
Richmond, Virginia

Genealogical Society of Bergen County – 300 Members
Midland Park, New Jersey

Genealogical Society of Collier County – 250 Members
Naples, Florida

Genealogical Society of Kendall County Texas – 175 Members
Boerne, Texas

Genealogical Society of Palm Beach County – 185 Members
West Palm Beach, Florida

Genealogy Society of Vallejo-Benicia – 40 Members
Vallejo, California

Gentry County Library – Serving 200 Genealogists
Stanberry, Missouri

Grand Strand Genealogy Club – 200 Members
Myrtle Beach, South Carolina

Greater Houston Jewish Genealogical Society – 50 Members
Houston, Texas

Houston Genealogical Forum – 200 Members
Houston, Texas

Highland Lakes Genealogy Society – 50 Members
Kingsland, Texas

Ingham County Genealogical Society – 70 Members
Mason, Michigan

International Association of Jewish Genealogical Societies
Cherry Hill, New Jersey

Iowa City Genealogical Society – 115 Members
Iowa City, Iowa

Irish Family History Forum – 425 Members
Plainview, New York

Israel Genealogy Research Association – 200 US-Based Members
Jerusalem, Israel

Jackson County Genealogical Society – 60 Members
Jackson, Michigan

Jewish Genealogical Society – 550 Members
New York, New York

Jewish Genealogical Society of the Conejo Valley and Ventura County – 190 Members
Agoura Hills, California

Jewish Genealogical Society of Greater Boston – 750 Members
Newton, Massachusetts

Jewish Genealogical Society of Illinois – 300 Members
Northbrook, Illinois

Jewish Genealogical Society of Maryland – 90 Members
Baltimore, Maryland

Jewish Genealogical Society of Nashville – 15 Members
Nashville, TN

Jewish Genealogical society of Orange County –50 Members
Seal Beach, California

Jewish Genealogical Society of Tampa Bay – 45 Members
Clearwater, Florida

Jewish Genealogy Society of Cleveland – 160 Members
Cleveland, Ohio

Jewish Genealogy Society of Greater Washington – 300 members
Rockville, Maryland

Jewish Genealogy Society of Long Island – 220 Members
Dix Hills, New York

Kinseekers of Fairfield Glade – 60 Members
Fairfield Glade, Tennessee

Kinseekers Genealogical Society of Lake County – 60 Members
Leesburg, Florida

Lake County (IL) Genealogical Society – 120 Members
Vernon Hills, Illinois

Lake County (OH) Genealogical Society – 120 Members
Painesville, Ohio

Livermore-Amador Genealogical Society – 130 Members
Livermore, CA

Martin County Genealogical Society – 170 Members
Stuart, Florida

Maryland Genealogical Society – 900 Members
Baltimore, Maryland

Massachusetts Genealogical Council – 16 organizations, 2,500 members

McLean County Genealogical Society – 130 Members
Normal, Illinois

Miami Valley Jewish Genealogy and History Society – 40 Members
Dayton, Ohio

Mid-Atlantic Germanic Society – 500 Members
New Windsor, Maryland

Montana State Genealogical Society – 600 Members
Helena, Montana

Montgomery County Genealogical & Historical Society – 25 Members
Conroe, Texas

Muskogee County Genealogical Society – 40 Members
Muskogee, Oklahoma

National Genealogical Society – 9,000 Members
Falls Church, Virginia

New York Genealogical and Biographical Society – 5,000 Members
New York, New York

Niagara County Genealogical Society – 230 Members
Lockport, New York

Nichi Bei Foundation – 1,000 Members
San Francisco, California

Nikkei Genealogical Society – 75 Members
Los Angeles, California

North Carolina Genealogical Society – 1,500 Members
Raleigh, North Carolina

North Hills Genealogists – 260 Members
Pittsburgh, Pennsylvania

Northeast Michigan Genealogical Society – 50 Members
Alpena, Michigan

Palatines to America German Genealogy Society – 1,000 Members
Columbus, Ohio

Pastfinders Genealogical Society of South Lake County – 100 Members
Clermont, Florida

Pima County Genealogy Society – 250 Members
Tucson, Arizona

Plainfield-Guilford Township Public Library – Serving 500 Genealogists
Plainfield, Indiana

Rochester Genealogical Society – 900 Members
Rochester, New York

Rock Island County Illinois Genealogical Society – 110 Members
Rock Island, Illinois

Rogue Valley Genealogical Society – 800 Members
Medford, Oregon

St. Louis Genealogical Society – 1,850 Members
St. Louis, Missouri

San Francisco Bay Area Jewish Genealogical Society – 225 Members
San Francisco, California

San Mateo County Genealogical Society – 255 members
Redwood City, California

Seeley Genealogical Society – 250 Members
Salt Lake City, Utah

South Bay Genealogical Society – 140 Members
Sun City Center, Florida

South Bend Area Genealogical Society – 120 Members
Mishawaka, Indiana

South Carolina Genealogical Society – 1,200 Members
Columbia, South Carolina

Sun City Hilton Head Computer Club, Genealogy Special Interest Group – 700 Members
Bluffton, South Carolina

Tennessee Genealogical Society – 1,400 Members
Germantown, Tennessee

Utah Genealogical Association – 900 Members
Salt Lake City, Utah

Utah Jewish Genealogical Society – 20 Members
Salt Lake City, Utah

The Family History Research Group – 100 Members
Lehi, Utah

The Villages Genealogical Society – 1,300 Members
The Villages, Florida

Virginia Beach Genealogical Society – 65 Members
Virginia Beach, Virginia

Virginia Genealogical Society – 1,700 Members
Orange, Virginia

Western Massachusetts Genealogical Society – 185 Members
West Springfield, Massachusetts