



AILA National Office
Suite 300
1331 G Street, NW
Washington, DC 20005

Tel: 202.507.7600
Fax: 202.783.7853

www.aila.org

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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-2009-0008

**Re: 60-Day Notice of Information Collection: Revision of a
Currently Approved Collection—Form I-751, Petition to
Remove Conditions on Residence
OMB Control No. 1615-0038
77 Fed. Reg. 65708 (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.

Part 1: Information About You—Question 22, Addresses: This question requires the applicant to provide all addresses and dates since becoming a permanent resident. A chart would assist applicants in providing this information in a clear and concise manner, particularly those who have moved frequently due to work or personal obligations.

Part 2: Basis for Petition—Extreme Hardship: Item 1.g. is currently worded, "The termination of my status and removal from the United

States would result in an extreme hardship.” But neither the form nor the instructions provide any guidelines as to what constitutes extreme hardship and to whom it applies. This is particularly important for unrepresented applicants.

Part 5: Accommodations for Individuals with Disabilities and Impairments: This section requests more details as to the reasons for seeking accommodations due to a particular type of disability. This is a positive change which will improve the ability of USCIS to accommodate the special needs of the applicant.

Part 7: Signature of Person Preparing Form: It would be helpful to add a field or series of fields here to indicate whether the preparer is an attorney, authorized representative, or other.

Addition of an Exhibit List: The addition of an “Exhibits” section, in table format, would be a welcome change to this and all USCIS forms that require supporting evidence or documents. This would allow the applicant to list all attached exhibits in one place within the form, rather than on a separate cover sheet.

Conclusion

We appreciate this opportunity to comment on this information collection.

Sincerely,

THE AMERICAN IMMIGRATION LAWYERS ASSOCIATION