

Department of Homeland Security

U.S. Citizenship & Immigration Services

Small Entity Analysis for Adjustment of the U.S. Citizenship and Immigration Services Fee Schedule



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SUMMARY

In accordance with the Regulatory Flexibility Act (RFA), USCIS has prepared an analysis examining the impact of this rule on small entities. A small entity may be: a small business, defined as any independently-owned and operated business not dominant in its field that qualifies as a small business according to the Small Business Administration's (SBA) published guidelines; a small not-for-profit organization; or, a small governmental jurisdiction (locality with fewer than 50,000 people).¹

The majority of immigration benefit petitions are submitted by individuals, rather than small entities. Entities affected by this rule are those that file and pay fees for certain immigration benefit petitions on behalf of an alien, including Form I-129, Petition for Nonimmigrant Worker, and Form I-140, Immigrant Petition for Alien Worker. USCIS conducted a statistically valid sample analysis of these petition types to determine if this rule has a significant economic impact on a substantial number of small entities.

USCIS utilized an online database of U.S. entities, Reference USA, to determine the North American Industry Classification System (NAICS) code, revenue, and employee count for each entity.² A list of NAICS codes for each entity matched in the Reference USA database is listed in Appendix A, along with the SBA threshold for each industry cluster. In order to determine an entity's size, USCIS first classified each entity by its NAICS code, and then used SBA guidelines to note the requisite revenue or employee count threshold for each entity. In some cases entities were classified as small based on their annual revenue and some by number of employees.

In order not to underestimate the economic impact of this proposed rule on small entities, this analysis uses a fee structure based on fees without including appropriated funds. If no appropriated funds are received by USCIS for FY 2011, this rule proposes to increase fees for Form I-129 from \$320 to \$355 (\$35 increase) and Form I-140 from \$475 to \$630 (\$155 increase).³

Research Population

Using fiscal year 2008 data on actual filings of Form I-129 and I-140 petitions, USCIS collected internal data for each filing organization including the name, Employer Identification Number (EIN), city, state, zip code, and number/type of filings. Each entity may make multiple filings; for instance, there were 525,709 I-129 and I-140 petitions, but only 148,289 unique entities.

Since the filing statistics do not contain information such as the revenue of the business, a third party source of data was necessary to help find this information. USCIS utilized the comprehensive online database from Reference USA to help determine an organization's small entity status and then applied SBA guidelines to the entities under analysis, as shown by the selected examples in Table 1.

¹ Guidelines viewed online at:

http://www.sba.gov/idc/groups/public/documents/sba_homepage/serv_sstd_tablepdf.pdf

² The Reference USA website can be found at: <http://www.referenceusagov.com>

³ With appropriated funds defraying some costs, the fees total: I-129 \$325 and I-140 \$580.

Table 1: Examples of Small Entity Classification

Name	Sales Revenue	Employee Count	SBA Threshold	Status
Sample Entity 1	-	80	500	Small Entity
Sample Entity 2	\$1,000,000,000	4,907	500	Not Small Entity
Sample Entity 3	\$1,000,000	5	\$33,500,000	Small Entity
Sample Entity 4	\$21,000,000	102	\$4,500,000	Not Small Entity

Sampling Statistics

USCIS devised a methodology to conduct the small entity analysis based on a representative sample of the potentially impacted population. To achieve a 95% confidence level and a 5% confidence interval on a population of 148,289 entities, DHS used the standard statistical formula to determine a minimum sample size of 383 entities from was necessary.

USCIS conducted searches on 891 randomly selected entities from a population of 148,289 unique entities. Based on past experience, USCIS expected to be able to find about 50 to 60 percent of the filing organizations in the Reference USA database, which includes information on 14 million U.S. entities. Accordingly, DHS created a sample size much greater than the 383 minimum necessary in order to allow for the non-matches. The 891 searches resulted in 512 instances where the name of the filing organization was successfully matched within Reference USA and 379 instances where the name of the filing organization was not found in the Reference USA database. Based on previous experience conducting regulatory flexibility analyses, USCIS assumes filing organizations not found in the Reference USA database are likely to be small entities and in order not to underestimate the number of small entities impacted by this rule, USCIS makes the conservative assumption to consider all of these 379 non-matched entities as small entities for the purpose of this analysis. Further, 52 of the 512 matched entities did not contain revenue or employee count data. Additional internet research allowed us to classify all 52 as small entities: 5 small non-profit/small governmental jurisdiction and 47 small businesses. Among the 512 matches, 336 were determined to be small entities based on their revenue or employee count and their NAICS code. Combining non-matches (379), small non-profit/governmental jurisdiction (22), matches missing data (52), and small entity matches (336), enables us to classify 789 of 891 entities as small. Table 2 illustrates the breakdown of key statistics at each step of the process.

Table 2: Outline of Research Statistics (FY 2008 data)

Parameter	Quantity	Comments
Population—petitions	525,709	Total number of petitions
Population—unique entities	148,289	Total number of unique employers ⁴
Total Sample	383	Sample size necessary to achieve confidence goals.
Over-sampling	891	Estimated sample needed to match 383 entities
Non-matched Sample Segment	379	Entities not found in Reference USA.
Matched Sample Segment	512	Entities matched in Reference USA from 891 searches. ⁵ This exceeds the established sample goal of 383.
Sub-Sample Non-profit/Govt.	22	Entities among the 512 matches confirmed as small non-profit organizations and/or small governmental jurisdictions. ⁶
Sub-Sample Missing Data	52	Entities among the 512 matches lacking revenue or employee count data.
Remaining Sub-Sample	336	Matched entities among 512, small entities based on revenue or employee data.
Number of small entities discovered in research	789	The aggregate of the 22, 52, 336 and 379 entities found above from 891 searches.
Number of non-small Entities	102	Number of non-small entities out of the 891 searches.
Number of small entities with published revenue data	332	The number of entities among the 512 matches with revenue data that will form the basis of the economic impact analysis.

Results

With an aggregated total of 789 out of a sample size of 891, DHS inferred that a majority, or 88.6%, of the entities filing Form I-129 and Form I-140 petitions were small entities. See Table 3 for small entity compositions.

Table 3: Small Entity Classification

Classification	Small Entity Status	Sample Size (#)	Sample Size (%)
Small Entity	Yes	789	89%
Entities not listed in Reference USA	Segment	379	-
Small non-profit/governmental jurisdiction	Segment	22	-
Entities missing data in Reference USA	Segment	52	-
Entities by revenue or employee count	Segment	336	-
Non-small Entities	No	102	11%
Total	-		100%

Furthermore, 332 of the 891 searched were small entities with the sales revenue data needed in order to estimate the economic impact of the proposed rule. Since these 332 were a small entity subset of the random sample of 891 searches, they were statistically significant in the context of this research.

⁴ Again, an entity may file multiple petitions.

⁵ In order to be considered a match in this analysis, the entity must have a similar name and location with the corresponding entry in Reference USA.

⁶ Note that the total number of small non-profit/governmental jurisdictions is 27: those uncovered through their Reference USA data (22) plus five that were missing data and confirmed through additional research.

Economic Impact Analysis

In order to calculate the economic impact of this rule, DHS estimated the total costs associated with the proposed fee increase for each entity, divided by sales revenue of that entity. For example, an entity with \$100,000 in sales revenue filed one Form I-129 and one Form I-140. Based on the proposed fee increase of \$35 for Form I-129 and \$155 for Form I-140, these increases would amount to a 0.19% economic impact on the entity, as shown below.⁷

$$[(1 \text{ form} \times \$35) + (1 \text{ form} \times \$155)]/\$100,000 = 0.19\%$$

Among the 332 small entities with reported revenue data, all experienced an economic impact considerably less than 1.0%. In fact, using the above methodology, the greatest economic impact imposed by this fee change totaled 0.19% and the smallest totaled 0.00002%. The average impact on all 332 small entities with revenue data was 0.055%.

Finally, the impact on small entities was examined by looking at each form separately. Since entities can file multiple forms, the analysis considers exactly how many forms each entity submitted. For example, an entity with \$100,000 in sales revenue that filed four Form I-129 would experience an economic impact of 0.14%; while an entity with sales revenue of \$500,000 filing three Form I-140 would experience an economic impact of 0.093%. All small entities filing I-129 experienced an average impact of 0.0215% (range of impact from 0.000004% to 0.525%). Similarly, the average impact on filers of Form I-140 of 0.0491% was also insignificant (range of impact from 0.00002% to 0.155%). The evidence suggests that the additional fee imposed by this rule does not represent a significant economic impact on these entities.

METHODOLOGY

Data Sources

The goal of this research was to analyze the economic impact on small entities of a proposed fee change by USCIS. In order to achieve this goal, several data sources were utilized to capture information on the identity and characteristics of entities submitting Forms I-129 and I-140.

- USCIS internal applicant data (see data retrieval process below)
- Reference USA online database of US entities
 - <http://www.referenceusagov.com>
- US Census Bureau's NAICS listing
 - <http://www.census.gov/eos/www/naics/>
- Small Business Administration's size standards for small entities
 - http://www.sba.gov/idc/groups/public/documents/sba_homepage/serv_sstd_tablepdf.pdf

Data Extraction/Analysis Process

USCIS internal data was extracted from CLAIMS 3, an internal USCIS database that stores the records of all fee-based benefit petitions (except for naturalization-related records). Data for both Forms I-129 and I-140 are stored in CLAIMS 3. For this analysis, USCIS retrieved all FY

⁷ Reference USA reports sales revenue for entities as a range of values. For this analysis, DHS utilized the lower end of the range in order to assure the potential economic impact of the proposed rule was not underestimated. For example, if Reference USA reported a filing organization had revenue between \$500,000 and \$750,000, this analysis assumed the revenue was \$500,000.

2008 Form I-129 and Form I-140 employer petition records, generating the base population for this research (525,709). Next, we created a working data file containing records for both form types. In this file, each record represented a single instance of a petition for a benefit filed by an employer on behalf of a worker. This approach meant that multiple entities were present in each file. Approximately 98% of I-129 and I-140 petitions from employers were filed with the entity's Employer Identification Number (EIN). USCIS used this identifier to match petitions filed by the same employer and aggregated the data, in order to record the number of instances that each unique employer filed for a particular benefit. Finally, USCIS drew a random sample from the population of 148,289 unique employers.

After the data extraction process, we followed the research plan below:

- Each entity name from the random sample was entered into the Reference USA online database for U.S. businesses. We matched entities based on name, address, and zip code (first three zip code digits).
- We collected information for any entity match, including: primary NAICS code, annual revenue, number of employees, and parent/subsidiary data. In the case of matches that identified a parent organization, we used the parent's data.
- Non-matches were recorded and further researched on the internet to determine their entity status.
- Data for matches was compared to the guidelines published by the SBA to determine if an organization met the definition of a small entity.

USCIS Petition Data

We performed additional analyses to gain a better understanding of the general characteristics of the small entities. Although the number of petition counts per small entity ranged from one to 49, the majority (82%) had filed only one form each, and 96% filed five or fewer forms. Table 4 shows the distribution of petition counts, reinforcing the claim that the majority of entities filed very few forms.

While entities filing five or fewer petitions represented an important segment of the population, the other entities that file large numbers of petitions were also an important part of the analysis as incremental fee increases represented a greater impact on their revenue. An analysis of the small entities filing over five forms gave further perspective on the impact of this fee increase for small entities. This analysis showed that the ten entities filing the greatest number of petitions accounted for 18.6% of the total number of sampled small entity petitions.

Table 4: Distribution of entities by petition count

Petition Count	Entity Count	Cumulative Count	Percentage	Cumulative Percentage
1	644	644	81.62%	81.62%
2	64	708	8.11%	89.73%
3	24	732	3.04%	92.77%
4	16	748	2.03%	94.80%
5	10	758	1.27%	96.07%
6 to 49	31	789	3.93%	100.00%
Total	789		100.00%	

The following two charts help summarize the distribution of all entities by petition counts. Chart 1 depicts the distribution of all entities by petition count and clearly shows the importance of entities filing five or fewer petitions.

Chart 1: Distribution of Petitions per Entity (Normal Scale)

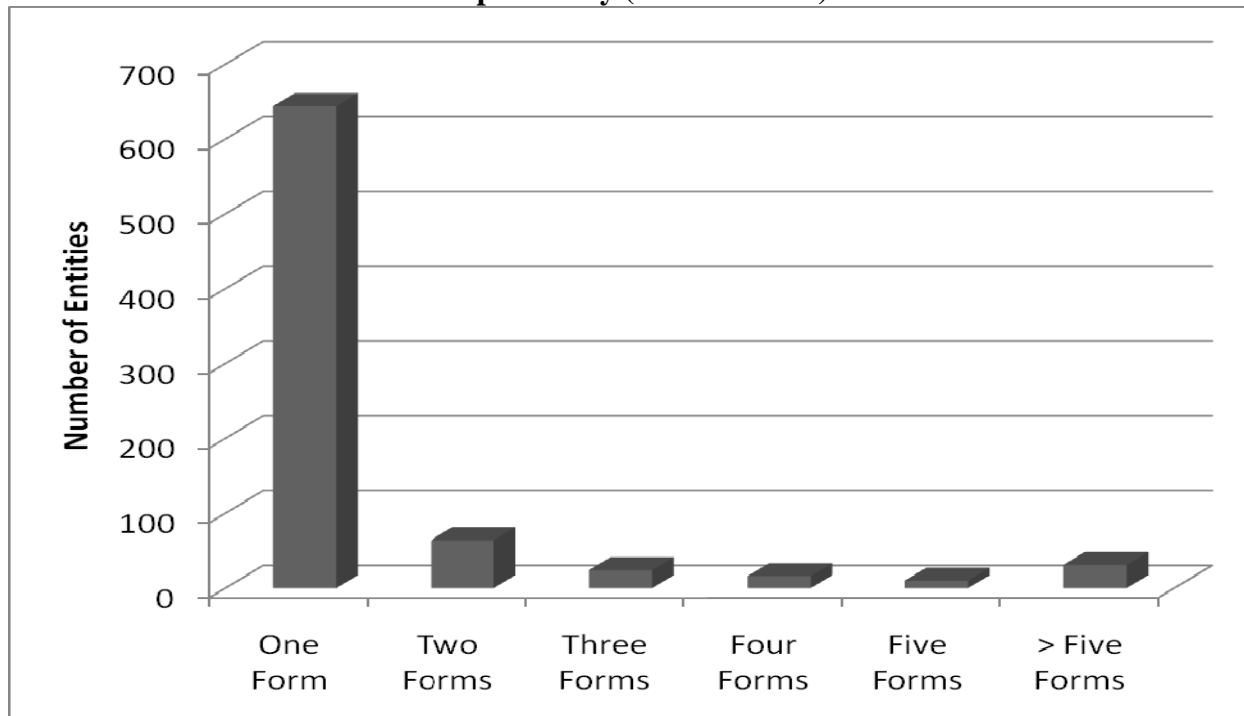
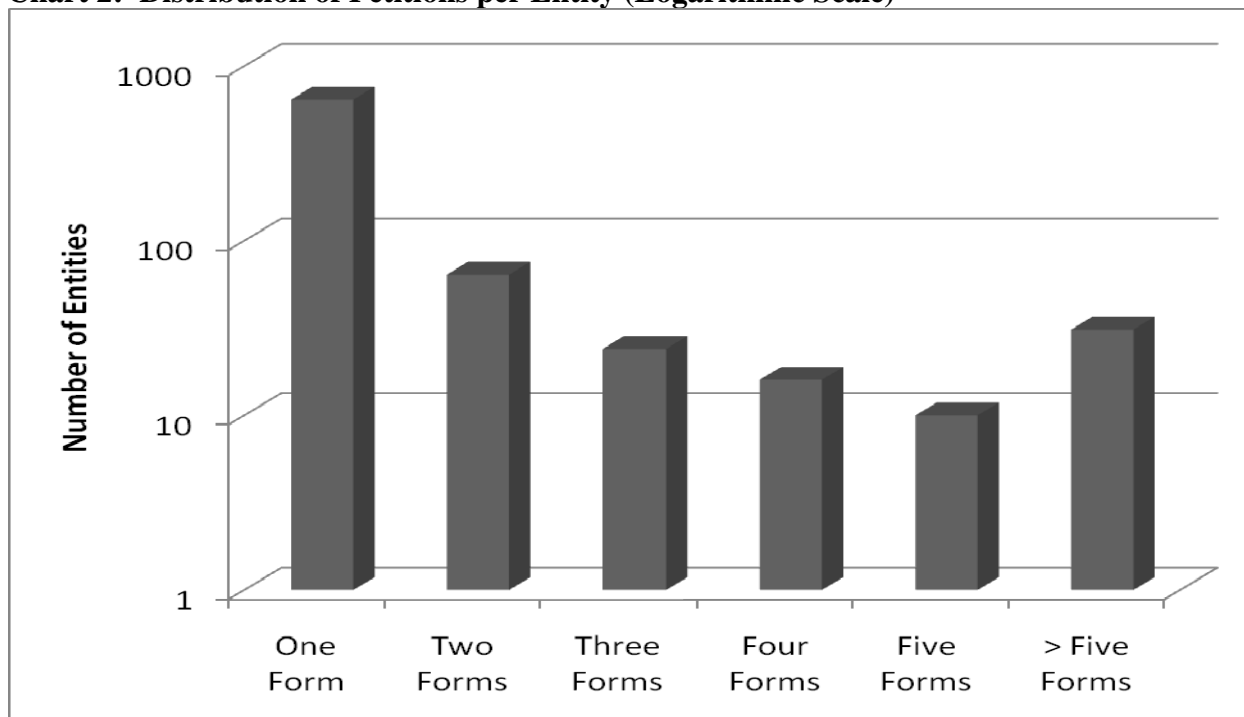


Chart 2 gives a different perspective to the same data by converting Chart 1 to a logarithmic scale. This version visually accentuates those companies filing a high volume of petitions.

Chart 2: Distribution of Petitions per Entity (Logarithmic Scale)



Random Sample

For a population of 148,289 unique entities, a randomly selected sample of 383 was necessary to project our findings on the population with a 95% confidence level and a 5% confidence interval. We conducted 891 searches in Reference USA to ensure that our number of matches would meet or exceed the 383 figure. These 891 searches resulted in 512 matches (57% match-rate).

The 379 entities that did not result in a match from the 891 searches were classified as small entities since those that are not listed in the Reference USA database were most likely small entities that had not been added to the database. Again, we classify these 379 entities as small in order to intentionally overstate the impact of this fee change on small entity revenue.

Additionally, there were 52 among the 512 of matched entities that did not have employee count data or revenue data to help determine their small entity status. A review of all 52 revealed that they were small non-profits, small governmental jurisdictions, and small businesses and should be classified as small entities.

Small Entity Analysis

Reference USA provided sales revenue and employee count data in standardized ranges instead of an exact value for the majority of the entities in their database. The most common ranges were from \$100,000 to \$500,000; \$500,000 to \$1 million; and from \$1 million to \$2.5 million. To adopt a more conservative approach to the analysis, we utilized the low-end of the range. This method overstated the impact of this rule in most cases.

From the 512 matches, we found 332 small entities with reported sales revenue data and utilized this low-end approach with each of them. Our research uncovered 789 small entities: 379 non-matches; 22 small non-profits or small governmental jurisdictions; 52 missing revenue/employee data; 86 based on employee count; and 250 based on the low-end revenue analysis. These small entities, irrespective of the type of petition filed (I-129 or I-140), made up about 89% of the entities in our sample. This clearly showed that the majority of entities filing for these benefits fell into the small entity category, as defined by the RFA.

ESTIMATING THE ECONOMIC IMPACT ON CIVIL SURGEONS

This rule proposes to establish a fee of \$615 to be collected from physicians who want to be authorized by USCIS to conduct medical examinations that are required of applicants for certain immigration benefits. This analysis utilized fees calculated without any appropriated funds, resulting in a \$665 fee for the Civil Surgeon application.

NUMBER OF SMALL ENTITIES TO WHICH THE PROPOSED RULE WOULD APPLY

USCIS estimates that it will receive requests for designation as a civil surgeon from 1,160 doctors in each FY 2010 and FY 2011. According to the Small Business Administration (SBA) Small Business Size Regulations at 13 CFR part 121, offices of physicians (except mental health professionals) are considered small entities when their annual sales are less than \$10 million.⁸ USCIS has no records on the average annual revenue for the doctors registered as civil surgeons. For the purposes of this analysis, it is assumed that they all have annual gross revenue of under \$10 million. Therefore, it is estimated that approximately 1,200 firms per year that file applications would be affected by this rule, with all of them being classified as small entities.

NEW COMPLIANCE COSTS OF THE PROPOSED RULE

The proposed rule would require physicians to pay a fee of \$665 to be authorized by USCIS to conduct medical examinations of applicants for certain immigration benefits.

SIGNIFICANCE OF IMPACT

To illustrate whether or not a rule could be significant, guidelines suggested by the SBA Office of Advocacy provide that, the cost of the proposed regulation may exceed one percent of the gross revenues of the entities in a particular sector or five percent of the labor costs of the entities in the sector.⁹

According to the U.S. Department of Labor, Bureau of Labor Statistics (BLS), Office of Occupational Employment Statistics, the mean annual wage for Family and General Practitioners is about \$161,490. Thus, the costs added by this rule are only 0.41 percent of the salary costs for one doctor.¹⁰ As stated before, the average total revenue of the civil surgeon is unknown. Nonetheless, for the new \$665 fee to exceed one percent of annual revenues, sales would be required to be \$66,500 per year or less. Therefore, USCIS believes that the costs of this rulemaking to small entities would not exceed one percent of the gross revenues of the entities in the affected sector.

Therefore, using both average annual labor costs and the percentage of the affected entities' annual revenue stream as guidelines USCIS believes that the civil surgeon registration fee proposed by this rule would not have a significant economic impact on a substantial number of small entities.

⁸ NAICS Code 62111. See U. S. Small Business Administration Table of Small Business Size Standards Matched to North American Industry Classification System Codes.

http://www.sba.gov/idc/groups/public/documents/sba_homepage/serv_sstd_tablepdf.pdf.
⁹ See SBA Office of Advocacy's A Guide for Government Agencies: How to Comply with the Regulatory Flexibility Act, 18, available at: <http://www.sba.gov/advo/laws/rfaguide.pdf>.

¹⁰ \$665/\$161,490.

ESTIMATING THE ECONOMIC IMPACT ON EB-5 REGIONAL CENTERS

The Immigrant Investor Program, also known as EB-5, was created by Congress in 1990 under 203(b)(5) of the Immigration and Nationality Act (INA) to stimulate the U.S. economy through job creation and capital investment by alien investors. Alien investors have the opportunity to obtain lawful permanent residence in the United States for themselves, their spouses, and their minor unmarried children by making a certain level of capital investment and associated job creation or preservation. There are two distinct EB-5 pathways for an alien investor to gain lawful permanent residence: the Basic Program and the Regional Center Pilot Program. Both programs require that the alien investor make a capital investment of either \$500,000 or \$1,000,000 (depending on whether the investment is in a Targeted Employment Area or not) in a new commercial enterprise located within the United States.

USCIS proposes a \$6,230 Immigrant Investor fee for entities requesting approval and designation as a Regional Center under the Immigrant Investor Pilot Program. The new application process will require the same information from applicants that is currently required, but will standardize/simplify the reporting format. This analysis utilized fees calculated without any appropriated funds, resulting in a \$6,820 fee for the EB-5 Regional Center analysis.

The DOS reports that 4,218 EB-5 visas were issued in 2009.¹¹ USCIS estimates that 1,687 of these are primary aliens (investors) and the remainder are dependents.¹² Typically, ninety percent of EB-5 investors participate in Regional Center-related projects, while the others invest individually. Therefore, USCIS estimates FY 2009 Regional Center investors at 1,518 aliens.¹³ As of October 1, 2009, there were 79 USCIS-approved Regional Centers, which equates to an average of 19.2 new investors per Regional Center in FY 2009.

Each Regional Center receives a minimum investment from every alien investor of \$500,000. A search of Regional Center websites shows that most charge each investor a “syndication fee” of \$20,000 to \$50,000.¹⁴ Further, during the application process, Regional Centers are required to provide a detailed statement regarding the amount and source of non-alien capital and a description of the planned promotional efforts. Combining the data, an average of 19.2 new investors, each investing \$500,000, leads to an average additional investment per Regional Center of \$9.6 million in FY 2009. While Regional Centers are prohibited from using alien investments to pay for overhead expenses, comparing FY 2009 average Regional Center investor receipts to the \$6,820 application fee provides a reasonable context in which to consider the economic impact of the proposed fee. The proposed Regional Center fee of \$6,820 would represent only 0.07104% of the \$9.6 million average additional investment per Regional Center in FY 2009. The proposed application fee of \$6,820 is only collected once and is not a recurring fee.

¹¹ http://www.travel.state.gov/visa/frvi/statistics/statistics_4581.html

¹² $4,218/2.5 = 1,687$ investors. USCIS estimates that 2.5 visas are issued for each primary alien.

¹³ $90\% \times 1,687 = 1,518$

¹⁴ Three exemplar websites are provided: http://www.cmbeb5visa.com/faq_timeline.aspx

<http://www.unyrc.com/process.html>

http://www.eb5dc.com/resources/CARc_AILA_Price_Plan_2_25_10_Extension.pdf

Additionally, a list of USCIS approved Regional Centers is available online at:

<http://www.uscis.gov/eb-5centers>

The data indicates there are 79 approved Regional Centers in the United States and its territories. An analysis of these 79 Regional Centers shows 66 of these Regional Centers are owned by small businesses and possibly one of these Regional Centers is owned by a small non-profit organization. Consequently, 67 of the existing 79 Regional Centers, or 85%, are small entities. Based on increased interest in the EB-5 program, USCIS estimates at least 132 new Regional Centers will be approved each year over the next two years. Since the overwhelming majority of these Regional Centers are small entities, for the purpose of this analysis, DHS will assume all 132 new Regional Centers are small entities.

In summary, even though a significant number of these Regional Centers are small entities, considering this proposed fee represents only 0.07104% of the average additional investment per Regional Center in FY 2009, DHS believes this \$6,820 fee does not constitute a significant economic impact on these entities. Nevertheless, DHS has prepared an Initial Regulatory Flexibility Analysis, included it in the proposed rule, and requests public comment on the impact of this rule on small entities.

Appendix A: NAICS Codes Associated with the 512 Entities Matched in Reference USA, includes only filers of Forms I-129 and I-140.

NAICS Code	NAICS Industry Title	Size Standard in Millions of Dollars	Size Standards in Number of Employees
111211	Potato Farming	\$0.75	
111339	Other Non-citrus Fruit Farming	\$0.75	
111998	All Other Miscellaneous Crop Farming	\$0.75	
115116	Farm Management Services	\$7.0	
115210	Support Activities for Animal Production	\$7.0	
211111	Crude Petroleum and Natural Gas Extraction		500
213112	Support Activities for Oil and Gas Operations	\$7.0	
221119	Other Electric Power Generation ¹⁵	See Footnote 1	
236115	New Single-Family Housing Construction (except Operative Builders)	\$33.5	
236118	Residential Remodelers	\$33.5	
236210	Industrial Building Construction	\$33.5	
236220	Commercial and Institutional Building Construction	\$33.5	
237210	Land Subdivision	\$7.0	
237990	Other Heavy and Civil Engineering Construction	\$33.5	
238110	Poured Concrete Foundation and Structure Contractors	\$14.0	
238160	Roofing Contractors	\$14.0	
238210	Electrical Contractors and Other Wiring Installation Contractors	\$14.0	
238220	Plumbing, Heating, and Air-Conditioning Contractors	\$14.0	
238310	Drywall and Insulation Contractors	\$14.0	
238350	Finish Carpentry Contractors	\$14.0	
238910	Site Preparation Contractors	\$14.0	
238990	All Other Specialty Trade Contractors ¹⁶	\$ 14.0	
311611	Animal (except Poultry) Slaughtering		500
311712	Fresh and Frozen Seafood Processing		500
311811	Retail Bakeries		500
311942	Spice and Extract Manufacturing		500
311999	All Other Miscellaneous Food Manufacturing		500
312111	Soft Drink Manufacturing		500
312130	Wineries		500
313249	Other Knit Fabric and Lace Mills		500
313312	Textile and Fabric Finishing (except Broad woven Fabric) Mills		500
314999	All Other Miscellaneous Textile Product Mills		500
315999	Other Apparel Accessories and Other Apparel Manufacturing		500
321918	Other Millwork (including Flooring)		500
323110	Commercial Lithographic Printing		500

¹⁵ NAICS codes 221111, 221112, 221113, 221119, 221121, 221122 – A firm is small if, including its affiliates, it is primarily engaged in the generation, transmission, and/or distribution of electric energy for sale and its total electric output for the preceding fiscal year did not exceed 4 million megawatt hours.

¹⁶ NAICS code 238990 – Building and Property Specialty Trade Services:
If a procurement requires the use of multiple specialty trade contractors (i.e., plumbing, painting, plastering, carpentry, etc.), and no specialty trade accounts for 50% or more of the value of the procurement, all such specialty trade contractors activities are considered a single activity and classified as Building and Property Specialty Trade Services.

NAICS Code	NAICS Industry Title	Size Standard in Millions of Dollars	Size Standards in Number of Employees
323113	Commercial Screen Printing		500
323119	Other Commercial Printing		500
324110	Petroleum Refineries ¹⁷		1,500
325620	Toilet Preparation Manufacturing		500
326199	All Other Plastics Product Manufacturing		500
326211	Tire Manufacturing (except Re-treading) ¹⁸		1,000
327390	Other Concrete Product Manufacturing		500
331316	Aluminum Extruded Product Manufacturing		750
331525	Copper Foundries (except Die-Casting)		500
332116	Metal Stamping		500
332618	Other Fabricated Wire Product Manufacturing		500
332710	Machine Shops		500
332812	Metal Coating, Engraving (except Jewelry and Silverware), and Allied Services to Manufacturers		500
332813	Electroplating, Plating, Polishing, Anodizing and Coloring		500
332913	Plumbing Fixture Fitting and Trim Manufacturing		500
333992	Welding and Soldering Equipment Manufacturing		500
333999	All Other Miscellaneous General Purpose Machinery Manufacturing		500
334220	Radio and Television Broadcasting and Wireless Communications Equipment Manufacturing		750
334412	Bare Printed Circuit Board Manufacturing		500
334413	Semiconductor and Related Device Manufacturing		500
334419	Other Electronic Component Manufacturing		500
334514	Totalizing Fluid Meter and Counting Device Manufacturing		500
334518	Watch, Clock, and Part Manufacturing		500
335129	Other Lighting Equipment Manufacturing		500
335211	Electric House wares and Household Fan Manufacturing		750
335311	Power, Distribution and Specialty Transformer Manufacturing		750
335999	All Other Miscellaneous Electrical Equipment and Component Manufacturing		500
337110	Wood Kitchen Cabinet and Counter Top Manufacturing		500
337122	Non-upholstered Wood Household Furniture Manufacturing		500

¹⁷ NAICS code 324110 – For purposes of Government procurement, the petroleum refiner must be a concern that has no more than 1,500 employees nor more than 125,000 barrels per calendar day total Operable Atmospheric Crude Oil Distillation capacity. Capacity includes owned or leased facilities as well as facilities under a processing agreement or an arrangement such as an exchange agreement or a throughput. The total product to be delivered under the contract must be at least 90 percent refined by the successful bidder from either crude oil or bona fide feed stocks.

¹⁸ NAICS code 326211 – For Government procurement, a firm is small for bidding on a contract for pneumatic tires within Census Classification codes 30111 and 30112, provided that:

- a) the value of tires within Census Classification codes 30111 and 30112 which it manufactured in the United States during the previous calendar year is more than 50 percent of the value of its total worldwide manufacture,
- b) the value of pneumatic tires within Census Classification codes 30111 and 30112 comprising its total worldwide manufacture during the preceding calendar year was less than 5 percent of the value of all such tires manufactured in the United States during that period, and
- c) the value of the principal product which it manufactured or otherwise produced, or sold worldwide during the preceding calendar year is less than 10 percent of the total value of such products manufactured or otherwise produced or sold in the United States during that period.

NAICS Code	NAICS Industry Title	Size Standard in Millions of Dollars	Size Standards in Number of Employees
337127	Institutional Furniture Manufacturing		500
337920	Blind and Shade Manufacturing		500
339112	Surgical and Medical Instrument Manufacturing		500
339116	Dental Laboratories		500
339920	Sporting and Athletic Goods Manufacturing		500
339999	All Other Miscellaneous Manufacturing		500
423120	Motor Vehicle Supplies and New Parts Merchant Wholesalers		100
423320	Brick, Stone, and Related Construction Material Merchant Wholesalers		100
423430	Computer and Computer Peripheral Equipment and Software Merchant Wholesalers		100
423450	Medical, Dental, and Hospital Equipment and Supplies Merchant Wholesalers		100
423490	Other Professional Equipment and Supplies Merchant Wholesalers		100
423610	Electrical Apparatus and Equipment, Wiring Supplies, and Related Equipment Merchant Wholesalers		100
423830	Industrial Machinery and Equipment Merchant Wholesalers		100
423840	Industrial Supplies Merchant Wholesalers		100
423850	Service Establishment Equipment and Supplies Merchant Wholesalers		100
423860	Transportation Equipment and Supplies (except Motor Vehicle) Merchant Wholesalers		100
423910	Sporting and Recreational Goods and Supplies Merchant Wholesalers		100
423930	Recyclable Material Merchant Wholesalers		100
423940	Jewelry, Watch, Precious Stone, and Precious Metal Merchant Wholesalers		100
423990	Other Miscellaneous Durable Goods Merchant Wholesalers		100
424120	Stationary and Office Supplies Merchant Wholesalers		100
424210	Drugs and Druggists' Sundries Merchant Wholesalers		100
424320	Men's and Boys' Clothing and Furnishings Merchant Wholesalers		100
424330	Women's, Children's, and Infants' Clothing and Accessories Merchant Wholesalers		100
424460	Fish and Seafood Merchant Wholesalers		100
424480	Fresh Fruit and Vegetable Merchant Wholesalers		100
424490	Other Grocery and Related Products Merchant Wholesalers		100
424520	Livestock Merchant Wholesalers		100
424690	Other Chemical and Allied Products Merchant Wholesalers		100
424720	Petroleum and Petroleum Products Merchant Wholesalers (except Bulk Stations and Terminals)		100
424930	Flower, Nursery Stock, and Florists' Supplies Merchant Wholesalers		100
424990	Other Miscellaneous Nondurable Goods Merchant Wholesalers		100
425120	Wholesale Trade Agents and Brokers		100
441120	Used Car Dealers	\$23.0	
441310	Automotive Parts and Accessories Stores	\$7.0	
442110	Furniture Stores	\$7.0	
442299	All Other Home Furnishings Stores	\$7.0	

NAICS Code	NAICS Industry Title	Size Standard in Millions of Dollars	Size Standards in Number of Employees
443112	Radio, Television and Other Electronics Stores	\$9.0	
443120	Computer and Software Stores	\$9.0	
444220	Nursery and Garden Centers	\$7.0	
445110	Supermarkets and Other Grocery (except Convenience) Stores	\$27.0	
445299	All Other Specialty Food Stores	\$7.0	
446110	Pharmacies and Drug Stores	\$7.0	
447190	Other Gasoline Stations	\$9.0	
448140	Family Clothing Stores	\$9.0	
448150	Clothing Accessories Stores	\$7.0	
448210	Shoe Stores	\$9.0	
448310	Jewelry Stores	\$7.0	
452990	All Other General Merchandise Stores	\$11.0	
453210	Office Supplies and Stationery Stores	\$7.0	
453910	Pet and Pet Supplies Stores	\$7.0	
453920	Art Dealers	\$7.0	
453998	All Other Miscellaneous Store Retailers (except Tobacco Stores)	\$7.0	
454210	Vending Machine Operators	\$7.0	
454390	Other Direct Selling Establishments	\$7.0	
481112	Scheduled Freight Air Transportation		1,500
485999	All Other Transit and Ground Passenger Transportation	\$7.0	
488510	Freight Transportation Arrangement ¹⁹	\$7.0	
493110	General Warehousing and Storage	\$25.5	
493190	Other Warehousing and Storage	\$25.5	
511110	Newspaper Publishers		500
511199	All Other Publishers		500
511210	Software Publishers	\$25.0	
512110	Motion Picture and Video Production	\$29.5	
512120	Motion Picture and Video Distribution	\$29.5	
512230	Music Publishers		500
515112	Radio Stations	\$7.0	
515210	Cable and Other Subscription Programming	\$15.0	
517210	Wireless Telecommunications Carriers (except Satellite)		1,500
517410	Satellite Telecommunications	\$15.0	
518210	Data Processing, Hosting, and Related Services	\$25.0	
519120	Libraries and Archives	\$7.0	
522110	Commercial Banking ²⁰	\$175 million in assets	
523910	Miscellaneous Intermediation	\$7.0	
523930	Investment Advice	\$7.0	

¹⁹ NAICS codes 488510, 531210, 541810, 561510, 561520 and 561920 – As measured by total revenues, but excluding funds received in trust for an unaffiliated third party, such as bookings or sales subject to commissions. The commissions received are included as revenue.

²⁰ NAICS Codes 522110, 522120, 522130, 522190, 522210 and 522293 – A financial institution's assets are determined by averaging the assets reported on its four quarterly financial statements for the preceding year. "Assets" for the purposes of this size standard means the assets defined according to the Federal Financial Institutions Examination Council 034 call report form.

NAICS Code	NAICS Industry Title	Size Standard in Millions of Dollars	Size Standards in Number of Employees
524210	Insurance Agencies and Brokerages	\$7.0	
524298	All Other Insurance Related Activities	\$7.0	
525110	Pension Funds	\$7.0	
531110	Lessors of Residential Buildings and Dwellings	\$7.0	
531210	Offices of Real Estate Agents and Brokers ²¹	\$2.0	
532291	Home Health Equipment Rental	\$7.0	
532310	General Rental Centers	\$7.0	
541110	Offices of Lawyers	\$7.0	
541211	Offices of Certified Public Accountants	\$8.5	
541213	Tax Preparation Services	\$7.0	
541310	Architectural Services	\$4.5	
541330	Engineering Services	\$4.5	
Except,	Military and Aerospace Equipment and Military Weapons	\$27.0	
Except,	Contracts and Subcontracts for Engineering Services Awarded Under the National Energy Policy Act of 1992	\$27.0	
Except,	Marine Engineering and Naval Architecture	\$18.5	
541410	Interior Design Services	\$7.0	
541511	Custom Computer Programming Services	\$25.0	
541512	Computer Systems Design Services	\$25.0	
541519	Other Computer Related Services	\$25.0	
Except,	Information Technology Value Added Resellers ²²		150
541611	Administrative Management and General Management Consulting Services	\$7.0	
541613	Marketing Consulting Services	\$7.0	
541614	Process, Physical Distribution and Logistics Consulting Services	\$7.0	
541618	Other Management Consulting Services	\$7.0	
541711	Research and Development in Biotechnology ²³		500

²¹ NAICS codes 488510, 531210, 541810, 561510, 561520 and 561920 – As measured by total revenues, but excluding funds received in trust for an unaffiliated third party, such as bookings or sales subject to commissions. The commissions received are included as revenue.

²² NAICS code 541519 – An Information Technology Value Added Reseller provides a total solution to information technology acquisitions by providing multi-vendor hardware and software along with significant services. Significant value added services consist of, but are not limited to, configuration consulting and design, systems integration, installation of multi-vendor computer equipment, customization of hardware or software, training, product technical support, maintenance, and end user support. For purposes of Government procurement, an information technology procurement classified under this industry category must consist of at least 15% and not more than 50% of value added services as measured by the total price less the cost of information technology hardware, computer software, and profit. If the contract consists of less than 15% of value added services, then it must be classified under a NAICS manufacturing industry. If the contract consists of more than 50% of value added services, then it must be classified under the NAICS industry that best describes the predominate service of the procurement. To qualify as an Information Technology Value Added Reseller for purposes of SBA assistance, other than for Government procurement, a concern must be primarily engaged in providing information technology equipment and computer software and provide value added services which account for at least 15% of its receipts but not more than 50% of its receipts.

²³ NAICS code 541711 and 541712 – For research and development contracts requiring the delivery of a manufactured product, the appropriate size standard is that of the manufacturing industry.

NAICS Code	NAICS Industry Title	Size Standard in Millions of Dollars	Size Standards in Number of Employees
541720	Research and Development in the Social Sciences and Humanities	\$7.0	
541810	Advertising Agencies ²⁴	\$7.0	
541840	Media Representatives	\$7.0	
541890	Other Services Related to Advertising	\$7.0	
541990	All Other Professional, Scientific and Technical Services	\$7.0	
551111	Offices of Bank Holding Companies	\$7.0	
551112	Offices of Other Holding Companies	\$7.0	
561110	Office Administrative Services	\$7.0	
561311	Employment Placement Agencies	\$7.0	
561312	Executive Search Services	\$7.0	
561320	Temporary Help Services	\$13.5	
561330	Professional Employer Organizations	\$13.5	
561440	Collection Agencies	\$7.0	
561499	All Other Business Support Services	\$7.0	
561510	Travel Agencies ²⁵	\$3.5	
561621	Security Systems Services (except Locksmiths)	\$12.5	
561720	Janitorial Services	\$16.5	
561730	Landscaping Services	\$7.0	
561990	All Other Support Services	\$7.0	
562991	Septic Tank and Related Services	\$7.0	
611110	Elementary and Secondary Schools	\$7.0	
611310	Colleges, Universities and Professional Schools	\$7.0	
611410	Business and Secretarial Schools	\$7.0	
611620	Sports and Recreation Instruction	\$7.0	
611710	Educational Support Services	\$7.0	
621111	Offices of Physicians (except Mental Health Specialists)	\$10.0	
621210	Offices of Dentists	\$7.0	
621310	Offices of Chiropractors	\$7.0	
621340	Offices of Physical, Occupational and Speech Therapists and Audiologists	\$7.0	
621399	Offices of All Other Miscellaneous Health Practitioners	\$7.0	
621511	Medical Laboratories	\$13.5	
621610	Home Health Care Services	\$13.5	
621999	All Other Miscellaneous Ambulatory Health Care Services	\$10.0	
622110	General Medical and Surgical Hospitals	\$34.5	
622210	Psychiatric and Substance Abuse Hospitals	\$34.5	

a) "Research and Development" means laboratory or other physical research and development. It does not include economic, educational, engineering, operations, systems, or other nonphysical research; or computer programming, data processing, commercial and/or medical laboratory testing.

b) For purposes of the Small Business Innovation Research (SBIR) program only, a different definition has been established by law. See section 121.701 of these regulations.

c) "Research and Development" for guided missiles and space vehicles includes evaluations and simulation, and other services requiring thorough knowledge of complete missiles and spacecraft.

²⁴ NAICS codes 488510, 531210, 541810, 561510, 561520 and 561920 – As measured by total revenues, but excluding funds received in trust for an unaffiliated third party, such as bookings or sales subject to commissions. The commissions received are included as revenue.

²⁵ Ibid.

NAICS Code	NAICS Industry Title	Size Standard in Millions of Dollars	Size Standards in Number of Employees
622310	Specialty (except Psychiatric and Substance Abuse) Hospitals	\$34.5	
623110	Nursing Care Facilities	\$13.5	
623311	Continuing Care Retirement Communities	\$13.5	
623312	Homes for the Elderly	\$7.0	
624190	Other Individual and Family Services	\$7.0	
624310	Vocational Rehabilitation Services	\$7.0	
624410	Child Day Care Services	\$7.0	
711110	Theater Companies and Dinner Theaters	\$7.0	
711190	Other Performing Arts Companies	\$7.0	
711211	Sports Teams and Clubs	\$7.0	
712110	Museums	\$7.0	
713940	Fitness and Recreational Sports Centers	\$7.0	
721110	Hotels (except Casino Hotels) and Motels	\$7.0	
721199	All Other Traveler Accommodation	\$7.0	
722110	Full-Service Restaurants	\$7.0	
722211	Limited-Service Restaurants	\$7.0	
722213	Snack and Nonalcoholic Beverage Bars	\$7.0	
722310	Food Service Contractors	\$20.5	
722410	Drinking Places (Alcoholic Beverages)	\$7.0	
811111	General Automotive Repair	\$7.0	
811113	Automotive Transmission Repair	\$7.0	
811121	Automotive Body, Paint and Interior Repair and Maintenance	\$7.0	
811212	Computer and Office Machine Repair and Maintenance	\$25.0	
812112	Beauty Salons	\$7.0	
812199	Other Personal Care Services	\$7.0	
812320	Dry cleaning and Laundry Services (except Coin-Operated)	\$4.5	
812990	All Other Personal Services	\$7.0	
813110	Religious Organizations	\$7.0	
813311	Human Rights Organizations	\$7.0	
813312	Environment, Conservation and Wildlife Organizations	\$7.0	
813319	Other Social Advocacy Organizations	\$7.0	
813410	Civic and Social Organizations	\$7.0	
813910	Business Associations	\$7.0	
813920	Professional Organizations	\$7.0	

Appendix B: Random Sample of 891 Entities Being Searched, with Petition Totals for filers of Forms I-129 and I-140.

Random Sample of 891 Entities Being Searched, with Petition Totals (I-129 & I-140 filers)	
Sample ID	Petition Total
1	1
2	1
3	1
4	1
5	1
6	1
7	3
8	1
9	1
10	1
11	1
12	1
13	2
14	1
15	1
16	1
17	1
18	2
19	5
20	1
21	1
22	1
23	1
24	1
25	1
26	2
27	1
28	1
29	1
30	1
31	1
32	1
33	1
34	2
35	1
36	1
37	2
38	1
39	2
40	1
41	1
42	1
43	4
44	1

Random Sample of 891 Entities Being Searched, with Petition Totals (I-129 & I-140 filers)	
Sample ID	Petition Total
45	1
46	1
47	1
48	1
49	1
50	1
51	3
52	1
53	1
54	1
55	6
56	2
57	2
58	1
59	1
60	1
61	1
62	2
63	1
64	3
65	1
66	1
67	2
68	3
69	2
70	1
71	3
72	9
73	1
74	1
75	2
76	1
77	11
78	1
79	1
80	1
81	1
82	13
83	1
84	1
85	1
86	1
87	1
88	1
89	1
90	1
91	1

Random Sample of 891 Entities Being Searched, with Petition Totals (I-129 & I-140 filers)	
Sample ID	Petition Total
92	1
93	18
94	1
95	1
96	1
97	2
98	1
99	16
100	1
101	1
102	1
103	1
104	1
106	1
108	1
109	1
110	2
111	1
112	1
114	1
115	1
116	35
117	36
118	2
119	1
120	12
121	1
122	2
123	1
124	1
125	1
126	1
127	1
128	1
129	1
130	1
131	1
132	1
133	1
134	1
135	2
136	1
137	1
138	4
139	241
140	2
141	2

Random Sample of 891 Entities Being Searched, with Petition Totals (I-129 & I-140 filers)	
Sample ID	Petition Total
142	1
143	2
144	1
145	1
146	1
147	1
148	1
149	1
150	1
151	1
152	1
153	1
154	2
155	1
156	1
157	14
158	1
159	1
160	1
161	1
162	1
163	1
164	1
165	1
166	1
167	1
168	1
169	3
170	2
171	1
172	2
173	1
174	1
175	1
176	1
177	1
178	1
179	1
180	1
181	1
182	1
183	1
184	1
185	1
186	1
187	1
188	1

Random Sample of 891 Entities Being Searched, with Petition Totals (I-129 & I-140 filers)	
Sample ID	Petition Total
189	1
190	1
191	1
192	1
193	1
194	1
195	1
197	1
198	1
199	1
200	1
201	1
202	1
203	1
204	1
205	1
206	1
207	1
208	1
209	15
210	1
211	1
212	2
213	1
214	1
215	3
216	1
217	1
218	1
219	1
220	1
221	1
222	1
223	1
224	6
225	1
226	1
227	1
228	1
229	1
230	2
231	1
232	1
233	1
234	1
235	6
236	1

Random Sample of 891 Entities Being Searched, with Petition Totals (I-129 & I-140 filers)	
Sample ID	Petition Total
237	1
238	1
239	1
240	2
241	1
242	110
243	2
244	2
245	1
246	1
247	1
248	1
249	1
250	1
251	2
253	1
254	4
255	1
256	1
257	3
258	1
259	1
260	1
261	1
262	1
263	1
264	1
265	1
266	1
267	1
268	1
269	6
270	2
271	1
272	3
273	1
274	1
275	1
276	1
277	1
278	1
279	2
280	1
281	1
282	1
283	1
284	1

Random Sample of 891 Entities Being Searched, with Petition Totals (I-129 & I-140 filers)	
Sample ID	Petition Total
285	6
286	1
287	1
288	1
289	1
290	1
291	1
292	2
293	1
294	1
295	1
296	2
297	1
298	2
299	1
300	1
301	1
302	1
303	1
304	1
305	1
306	1
307	1
308	1
309	1
310	1
311	1
312	1
313	1
314	1
315	1
316	1
317	3
318	1
319	1
320	1
321	15
322	1
323	1
324	1
325	4
326	5
327	2
328	1
329	1
330	1
331	1

Random Sample of 891 Entities Being Searched, with Petition Totals (I-129 & I-140 filers)	
Sample ID	Petition Total
332	1
333	1
334	1
335	1
336	1
337	2
338	1
339	1
340	1
341	1
342	1
343	1
344	5
345	1
346	2
347	1
348	5
349	1
350	1
351	1
352	1
353	2
354	1
355	1
356	1
357	1
358	1
359	1
360	4
361	1
362	1
363	1
364	1
365	1
366	1
367	1
368	1
369	1
370	1
371	1
372	1
373	1
374	1
375	2
376	1
377	1
378	1

Random Sample of 891 Entities Being Searched, with Petition Totals (I-129 & I-140 filers)	
Sample ID	Petition Total
379	8
380	1
381	1
382	1
383	1
384	1
385	1
386	1
387	1
388	1
389	1
390	1
391	1
392	1
393	7
394	1
395	1
396	3
397	1
398	2
399	1
400	8
401	1
402	1
403	10
404	2
405	1
406	1
407	1
408	1
409	2
410	49
411	1
412	1
413	1
414	1
415	1
416	1
417	1
418	2
419	1
420	6
421	1
422	1
423	1
424	1
425	1

Random Sample of 891 Entities Being Searched, with Petition Totals (I-129 & I-140 filers)	
Sample ID	Petition Total
426	1
427	1
428	1
429	1
430	1
431	1
432	1
433	1
434	1
435	1
436	1
437	1
438	1
439	1
440	4
441	3
442	1
443	1
444	1
445	1
446	3
447	1
448	1
449	1
450	1
451	5
452	1
453	1
454	2
455	2
456	1
457	1
458	3
459	5
460	1
461	1
462	1
463	1
464	1
465	1
466	5
467	7
468	1
469	1
470	1
471	1
472	1

Random Sample of 891 Entities Being Searched, with Petition Totals (I-129 & I-140 filers)	
Sample ID	Petition Total
473	1
474	1
475	1
476	1
477	1
478	1
479	1
480	1
481	2
482	1
483	1
484	4
485	2
486	1
487	1
488	1
489	1
490	1
491	1
492	1
493	3
494	1
495	1
496	1
497	1
498	1
499	1
500	1
501	1
502	1
503	1
504	2
505	1
506	1
507	1
508	1
509	1
510	1
511	1
512	2
513	1
514	1
515	1
516	1
517	1
518	1
519	1

Random Sample of 891 Entities Being Searched, with Petition Totals (I-129 & I-140 filers)	
Sample ID	Petition Total
520	1
521	1
522	1
523	2
524	1
525	1
526	9
527	1
528	2
529	4
530	1
531	1
532	1
533	4
534	4
535	1
536	1
537	4
538	1
539	1
540	1
541	1
542	1
543	1
544	1
545	1
546	1
547	1
548	1
549	1
550	1
551	1
552	1
553	1
554	1
555	1
556	1
557	1
558	1
559	1
560	1
561	1
562	1
563	1
564	1
565	2
566	1

Random Sample of 891 Entities Being Searched, with Petition Totals (I-129 & I-140 filers)	
Sample ID	Petition Total
567	2
568	1
569	1
570	1
571	1
572	1
573	1
574	1
575	1
576	1
577	1
578	1
579	1
580	1
581	1
582	1
583	1
584	1
585	2
586	2
587	1
588	1
589	1
590	5
591	1
592	1
593	1
594	1
595	1
596	1
597	1
598	1
599	1
600	1
601	1
602	2
603	1
604	1
605	1
606	1
607	1
608	2
609	2
610	1
611	1
612	1
613	1

Random Sample of 891 Entities Being Searched, with Petition Totals (I-129 & I-140 filers)	
Sample ID	Petition Total
614	1
615	1
616	1
617	1
618	1
619	1
620	1
621	1
622	1
623	1
624	1
625	1
626	1
627	1
628	74
629	1
631	1
632	1
633	1
634	1
635	1
636	1
637	1
638	1
639	10
640	1
641	1
642	1
643	1
644	1
645	1
646	1
647	1
648	3
649	1
650	1
651	1
652	7
653	1
654	1
655	73
656	1
657	1
658	1
659	2
660	1
661	1

Random Sample of 891 Entities Being Searched, with Petition Totals (I-129 & I-140 filers)	
Sample ID	Petition Total
662	2
663	1
664	1
665	1
666	4
667	1
668	1
669	2
670	1
671	1
672	1
673	3
674	1
675	3
676	2
677	1
678	1
679	3
680	1
681	1
682	3
683	1
684	1
685	1
686	1
687	1
688	1
689	1
690	45
691	1
692	1
693	1
694	1
695	4
696	1
697	2
698	1
699	1
700	1
701	19
702	1
703	1
704	3
705	7
706	1
707	5
708	1

Random Sample of 891 Entities Being Searched, with Petition Totals (I-129 & I-140 filers)	
Sample ID	Petition Total
709	1
710	1
711	1
712	1
713	1
714	1
715	1
716	1
717	1
718	1
719	32
720	1
721	1
722	1
723	1
724	2
725	1
726	6
727	3
728	1
729	1
730	1
731	1
732	1
733	1
734	2
735	1
736	1
737	1
738	4
739	1
740	1
741	1
742	1
743	1
744	1
745	1
746	1
747	1
748	1
749	1
750	3
751	1
752	13
753	1
754	10
755	1

Random Sample of 891 Entities Being Searched, with Petition Totals (I-129 & I-140 filers)	
Sample ID	Petition Total
756	1
757	1
758	2
759	1
760	1
761	1
762	1
763	1
764	1
765	1
766	1
767	2
768	1
769	8
770	1
771	1
772	1
773	1
774	1
775	1
776	1
777	2
778	1
779	1
780	1
781	14
782	1
783	1
784	4
785	2
786	2
787	8
788	3
789	1
790	2
791	1
792	1
793	1
794	1
795	1
796	1
797	1
799	1
800	6
801	1
802	1
803	1

Random Sample of 891 Entities Being Searched, with Petition Totals (I-129 & I-140 filers)	
Sample ID	Petition Total
804	2
805	3
806	1
807	1
808	7
809	1
810	1
811	1
812	1
813	1
814	3
815	1
816	4
817	1
818	5
819	1
820	1
821	1
822	1
823	4
824	1
825	1
826	1
827	1
828	1
829	2
830	1
831	1
832	2
833	1
834	1
835	1
836	1
837	3
838	1
839	1
840	1
841	2
842	1
843	1
844	1
845	4
846	1
847	1
848	1
849	1
850	1

Random Sample of 891 Entities Being Searched, with Petition Totals (I-129 & I-140 filers)	
Sample ID	Petition Total
851	1
852	1
853	1
854	1
855	1
856	1
857	1
858	110
859	1
860	1
861	1
862	1
863	1
864	1
865	1
866	1
867	2
868	1
869	1
870	1
871	2
872	4
873	2
874	1
875	1
876	5
877	2
878	1
879	1
880	1
881	1
882	1
884	1
885	1
886	1
887	1
888	1
889	1
890	1
891	1