



February 23, 2023

To whom it may concern,

We are CelticMKE, home of Milwaukee Irish Fest. We are an international music and cultural festival held for the past 43 years on the third weekend in August and annually attract over 100,000 patrons to our cultural event. We pride ourselves on hiring top international artists from Ireland, Scotland, Canada and all over the world for an event that celebrates the exchange of culture and music on the shores of Lake Michigan in beautiful Milwaukee, Wisconsin.

It has come to our attention that the U.S. Department of Homeland Security (DHS) has issued a proposed rule that would impose very steep increases to some of its filing fees, including for O and P artist visa's application filed by U.S. petitioners. The proposed fee increases would be:

- Filing fees for regularly-processed **O visa petitions would increase by 260% from \$460 to \$1,655 per petition** (this would include a \$600 surcharge to fund the Asylum Program Fee).
- Filing fees for regularly-processed **P visa petitions would increase by 251% from \$460 to \$1,615 per petition** (this would include a \$600 surcharge to fund the Asylum Program Fee).
- The total number of individuals on a single petition, including O and P arts petitions, would be **capped at 25 beneficiaries**. This would require numerous petitions for [larger ensembles](#). For example, a visiting orchestra comprising 110 musicians, plus a handful of accompanying [support staff](#) would require 6 visa petitions rather than 2.
- The [Premium Processing Service](#) (unaffordable to most organizations at a current cost of \$2,500) would take longer with USCIS redefining the timeframe from 15 calendar days to 15 business days (federal working days) in order to complete processing.

This comes on top of fee increases for the aforementioned Premium Processing fee which has seen increases in 2018 and in 2020. In 2018 the Premium Processing fee went from \$1250 to \$1410 a 14% increase. In 2020 the Premium Processing fee went from \$1410 to \$2500 an increase of 77%.

The timing of these increased fees could not be more devastating as the music industry was an industry hard hit by the COVID pandemic. Most artists would not be able to absorb these increased costs.



CelticMKE, home of Milwaukee Irish Fest, paid over \$17,000 in 2022 to assist 4 emerging artists from overseas to get visas to play our festival and other fests in the U.S. Even with premium processing the USCIS could not fulfill its promise of an expedited visa mostly due to the appointment all artists must make at the US Consulate in their country.

USCIS has been inconsistent with these appointments. In previous years if a petitioner for a visa was submitting for a visa that they had previously been accepted for, they would be waived for an interview at the U.S. consulate and the visa would be mailed to them. Currently it seems that all visa petitioners need an appointment whether it's the first time they have received a visa or their 20th time. This clogs the system with beneficiaries. With the current system even if a petitioner paid for premium processing and got their visa approved in 15 days it could be months to get an interview in the U.S. Consulate, which is what happened to CelticMKE's artists in 2022. Secondly instead of actually getting the visa at these interviews the USCIS insists on mailing the visa after the interview. Adding another week to 10 days to the process.

A summary of some of the issues we see with the proposed increase in visa fees:

- Arts organizations throughout the U.S. do not have the financial ability to absorb these types of cost increases
- Drastic fee increases will stifle international cultural activity, put U.S. based jobs at risk, and have a negative economic ripple effect on communities who support the arts.
- Delays in processing are already forcing some petitioners to pay the unaffordable Premium fee, or forgo engaging international artists
- As CelticMKE has learned from trying to book international artists for its 2023 festival, International artists are wary of the U.S. due to its continued visa and tax cost and processing difficulties. More Irish artists than ever are touring Europe and other countries rather than the U.S. due to increased costs. This will have a devastating effect on artists traveling to the U.S. from Ireland and beyond.

Some suggestions CelticMKE would like to propose:

- Make the artist's visa application process more efficient and reliable
- If it's a beneficiary's first visa, please issue the visa at the time of the interview at the consulate
- For those petitioners submitting for subsequent visas, waive the interview at the consulate

We urge you to prevent this new rule from moving forward and maintain the current prices for artists visas.

Sincerely

CelticMKE