

Professional-Regulatory Comment

Operational, Economic, and Governance Impacts

To: U.S. Citizenship and Immigration Services (USCIS) Docket No. USCIS–2025–0006 / RIN 1615–AC71 Subject: Professional and Regulatory Comment — Operational and Economic Impact

As a public-health systems researcher and consultant, I submit this comment to highlight the operational and economic harms likely to result from this rule.

Mandating biometric collection across all applicant classes introduces significant administrative burden, delays, and compliance costs. The proposed rule projects an annualized cost exceeding \$288 million, but the true burden will compound through secondary verification delays and IT infrastructure costs borne by employers, schools, and state partners.

Continuous vetting and cross-agency data reuse may also produce unintended data redundancy and privacy exposure, especially in shared-system environments. Businesses reliant on lawful immigration pipelines—medical, educational, and logistics sectors—will face greater processing uncertainty and reputational risk.

DHS should conduct a revised cost-benefit analysis, including data integrity risks, small business impact, and feasibility of biometric reuse limits before finalizing this rule.

Respectfully, Brian J. London, MPH(c) Public-Health Systems Researcher B JL13 Enterprise Solutions LLC

Signature: _____
Date: _____