

October 19, 2020

Submitted via www.regulations.gov

Sharon Hageman

Acting Regulatory Unit Chief, Office of Policy and Planning U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security
500 12th Street SW
Washington, D.C. 20536

Re: DHS Docket No. ICEB-2019-0006-0001, Comments in Response to Establishing a Fixed Time Period of Admission and an Extension of Stay Procedure for Nonimmigrant Academic Students, Exchange Visitors, and Representatives of Foreign Information Media

On behalf of the Geological Society of America (GSA), I submit this comment letter in response to the U.S. Department of Homeland Security's proposed rule, Establishing a Fixed Time Period of Admission and an Extension of Stay Procedure for Nonimmigrant Academic Students, Exchange Visitors, and Representatives of Foreign Information Media (DHS Docket No. ICEB-2019-0006-0001), published September 25, 2020.

GSA asks that the proposed rule be withdrawn in its entirety, and that admission for the duration of status remain in effect.

As noted in GSA's position statement, "Visas for Foreign Scientists and Students"

(https://www.geosociety.org/GSA/Science_Policy/Position_Statements/Current_Statements/gsa/positions/position8.aspx),

"GSA endorses a United States visa system that supports international scientific exchange and cooperation. Government visa policy is especially important to the earth sciences as Earth science is inherently an international endeavor because it is not possible to understand Earth by studying only those parts of the planet that fall within the boundaries of a single country."

"Our nation's colleges and universities, corporations engaged in scientific research and development, and scientific and technical organizations are the engines of the new knowledge, innovation, and advanced training that power the country's research enterprise and contribute greatly to economic and national security. Moreover, they are important hubs of international scientific and technical exchanges, and they play a vital role in facilitating educational and cultural interactions that help to spread our nation's values."

"GSA believes the United States must have a visa system that supports international scientific exchange and cooperation. We are confident that it is possible to have a system that protects national security and yet is still timely and transparent, provides for thorough reviews of applicants, and welcomes the finest talent.

Scientific exchange and security are not mutually exclusive; to the contrary, they complement each other, and each is vital to the other.”

“A system that maintains our nation’s security while encouraging the entry of the brightest and most qualified international students, scholars, scientists, and engineers will bolster American scientific and economic competitiveness, as well as help restore America’s image abroad.”

Thank you for the opportunity to submit comments.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Vicki S. McConnell". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Vicki S. McConnell, Ph.D.
GSA Executive Director