

Angelo-

My concern relates to situations where the USCIS Service Centers receive multiple "mirror image" petitions for the same company, same job location, same position, same wage, and same level. Sometimes these identical petitions have been filed over a period of time, and sometimes they arrive in the USCIS mailroom on the same day - - *often under the same cover*.

In such cases where there is a "batch" of identical filings, we will receive instant approvals on some petitions and scathing RFEs on others. The RFEs can highlight wildly different issues, many of them "red herrings."

Why is it that the Service Centers haven't caught up with the real world? In *Fortune 500* companies and successful professional service organizations, client account teams are established to develop a deep understanding of the client's industry and its unique culture - - and to avoid "re-inventing the wheel" each time the client presents a need for a service.

**Why can't it be this way with USCIS?** Why can't identical cases be triaged to the same adjudicator or small group of adjudicators who are familiar with the industry or (heaven forbid!) the petitioning company? Why can't examiners share information and communicate with one another? Why is it that an H-1B "profile" for a specific role within a specific company - - where precisely the same type of petition has been approved 300 times before - - can carry no "precedential" value? There is no equity to this approach. And, as we all know, this simply paves the way for a rogue or intellectually dishonest examiner to issue a multi-page RFE on an *ad hoc* basis.

It's government tyranny, and it has to stop.

The USCIS needs to comport itself the way its stakeholders have done for years. It needs to roll out training - - and re-training - - programs for USCIS officers who aren't currently willing to take the time or effort to read petitions. And the USCIS leadership needs to uncover the real truth behind the culture of examiners being required to meet "quotas" for the issuance of RFEs.

The USCIS also needs to institute a Quality Control system whereby, before any substantive RFE can be issued, it is first vetted and approved by a seasoned supervisor who will first check the database on the petitioning company's overall track record with the Service, note any mirror-image petitions that may have previously been filed and approved, and carefully assess the wisdom of going through with the issuance of the RFE.

So there's my candle in the darkness.