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The changes proposed here raise the risk of failing to conform with the International Civil Aviation Organization standards, as the changes indicate that a passport shall carry neither a person's sex nor that person's sex at the time of issuance. Per International Civil Aviation Organization standards's Doc 9303 Part 4 "Specifications for Machine Readable Passports (MRPs) and other TD3 Size MRTDs", table 4.1.1.1, the "Sex" field displayed on the passport shall be rendered as "Sex of the holder, to be specified by use of the single initial commonly used in the language of the State or organization where the document is issued and, if translation into English, French or Spanish is necessary, followed by an oblique and the capital letter F for female, M for male, or X for unspecified."

The changes proposed require individuals to indicate sex recorded at birth / earliest recorded sex, which may not match the passport holder's actual sex at the time of renewal. Errors in data entry for example can cause the earliest recorded sex to be incorrect. These changes can persist unnoticed for many years, and in many states may become uncorrectable. Similarly, many people later discover their present sex does not reflect what is recorded on their birth certificate or other documentation. The cause for which that discovery is made is not relevant to the standards established as a part of Doc 9303, as it simply standardizes the inclusion of the passport holder's current sex.

Deviation from the standard, by failing to accurately include the holder's current sex, risks causing confusion for border control personnel and other authorities, as well as businesses which may use passports for a variety of purposes such as verifying employment eligibility or validating a customer's age. Information which apparently does not match the person in front of them may cause them to erroneously believe a passport is fraudulent, which may result in the waste of authorities' (and therefore, taxpayers') resources to investigate, in addition to causing great inconvenience to all parties involved (i.e: the passport holder, border control personnel, any other involved authorities, businesses, etc). In a particularly grim scenario, this could result in the imprisonment of a US Citizen in a foreign country, which not only needlessly endangers the passport holder, but also further needlessly exhausts state department resources, for an induced problem which is readily preventable by just continuing to issue passports which reflect holders's current sex. Passports are identification documents. Passports should therefore carry information which accurately reflects the holder's identity, including their current sex or gender. Absent the ability to have sex or gender accurately reflected, holders should be permitted to unspecify the field via the standardized "X" value, which is specified and explicitly permitted in Doc 9303 (see previous quote from table 4.1.1.1).

Therefore, the proposed changes should be rejected or rescinded. A passport should reflect the holder's current sex/gender.