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I respectfully submit my concerns regarding the proposed revision to Form DS-82, which would require passport applicants to list their biological sex at birth. This change is both unnecessary and legally dubious.

Most notably, this requirement appears to be in direct conflict with the U.S. District Court ruling in *Zzyym v. Blinken*, which found that denying accurate and inclusive passport markers violated federal law. The Department of State has already been ordered to recognize that sex is not a simple binary, particularly for intersex individuals. Reintroducing a policy that disregards this ruling could lead to further legal challenges.

From a scientific standpoint, biological sex is far more complex than a simple male/female classification. Research has long established that chromosomes, hormone exposure, and gene expression all play roles in sex differentiation. The existence of individuals with XY chromosomes who develop female secondary sex characteristics, or XX individuals with androgen excess, highlights that the "sex at birth" designation is not always definitive. For some, it is assigned arbitrarily based on external anatomy rather than genetic or endocrine factors.

As a transgender person in transition, I also anticipate serious logistical challenges if this change is implemented. I have already begun the legal process of updating my identity documents. If my renewed passport were to introduce conflicting information—especially as I may obtain a second passport from another country that correctly reflects my gender—it could create unnecessary difficulties while traveling, including scrutiny at border crossings and potential denial of entry.

The purpose of the DS-82 form is to facilitate a seamless renewal process for existing passport holders. Adding this requirement does nothing to improve security or administrative efficiency but instead introduces privacy risks and legal inconsistencies. I urge the Department of State to reconsider this revision.