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I am very concerned with the proposed changes to passport application forms replacing the gender field with a "birth sex" field. This is a dangerous change that will harm many American citizens with absolutely no benefit to anyone. Trans and non-binary people exist and deserve to be recognized as their true gender on their identification documents. This regressive step of only recognizing sex assigned at birth on passports will cause a lot of harm to people who have made the brave step of living their gender rather than the one assigned at birth that does not fit them. The joy that people feel at being recognized as who they truly are is a beautiful thing. This change, for no benefit, denies people the peace of having their identification documents match who they are. You are asking women and men to carry documents that do not match them, inciting confusion at every stop where, say, a woman with long hair in a dress is compared to a document that says "M". It is cruel and totally avoidable. Please do not make this change.

You have requested feedback on the following specific points:

* Evaluate whether the proposed information collection is necessary for the proper functions of the Department.

As far as I can tell, the purpose of the gender field on the passport is to aid in identification of the represented person. Someone's current gender expression is much more likely to be identifiable than whatever they were assigned at birth. Collecting this information will not help with the functioning of the state department.

* Evaluate the accuracy of our estimate of the time and cost burden for this proposed collection, including the validity of the methodology and assumptions used.

It appears that you used the number of annual applications for this form to measure the burden of this change. But what is much more concerning is the burden on people who already have a passport and will need to change their passport. It is possible that this change will come with a change in enforcement where already issued passports will not be honored if the gender marker does not match someone's birth sex. There is already a long process to change your gender marker on identification documents, moving the passport to exist outside of that process complicates things and makes it harder for people to get their passport when they have already changed other documents to match their gender.

* Enhance the quality, utility, and clarity of the information to be collected.

The data collected will be less of all three. Intersex people will not be representable at all in this new system.

* Minimize the reporting burden on those who are to respond, including the use of automated collection techniques or other forms of information technology.

This doesn't directly change but as stated above this change will cause a burden on many citizens that already have passport documents.