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I don't entirely understand the need to update DS-11 to require asking for sex assigned at birth compared to previous versions of DS-11s. Based on the information available publicly, it appears that this would increase costs and time compared to maintaining the existing DS-11 (which did not require this). It will also likely create confusion among American citizens traveling abroad for a select group of individuals for whom their sex assigned at birth may not be how they are perceived, either through their own actions or those perceiving them.

I would encourage not updating DS-11 and instead keeping the original version, which would save America time and money while providing more accurate information. Supporting justification for this additional time and money expenditures seems to be lacking from publicly available documentation.

As a possibly relevant aside, I'm unsure if these changes are in line with the rulings of *Zzyym v. Blinken* and would encourage State to investigate this further to ensure these changes align with that ruling.