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This proposed change does not seem to match the claimed objectives. One stated objective is to "Enhance the quality, utility, and clarity of the information to be collected," but the insistence that there are only two biological sexes is factually incorrect - there are a number of biological situations beyond the common XX and XY chromosome one. So to restrict it to only these would, by definition, mean that for a number of individuals their passport would be in fact biologically incorrect.

I also question how "proposed information collection is necessary for the proper functions of the Department." What does switching to "sex" instead of "gender" advance in terms of accurately identifying that the individual in the passport is who they say they are? Unless the TSA is planning on implementing chromosomal screening, it seems that gender is a far better guide for an official inspecting a passport to with the goal of verifying identity.