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Regarding the proposed revision to Form DS-5504 that purports to follow the Executive Order 14168, "the revised DS-5504 will request the applicant's biological sex at birth": The EO does not state "at birth" but rather states "at conception". This is problematic at best because as anyone with a intro level biology understanding knows, 'at conception' all fetuses are female by default, whether XX, XY, XXY, X, or XXYY, and it is only later in the fetal development process that many fetuses with XY chromosomes begin to show the male characteristics to which this EO refers.

If one assumes "at birth" and "at conception" are equivalent (which biologically they are not, but for the purposes of argument here): as a medical provider I can tell you, there is no biological testing that is performed at birth in order to 'sex' children. Thus, many people who are born with XY chromosomes but have androgen insensitivity will be 'sexed' as female, just as one example of the many ways 'biological sex' is not as simple as this administration would like it to be. Thus, unless the administration would also like to impel by law all medical providers to chromosomally 'sex' all children at birth, this EO has no basis in science, medical practice, and is functionally unenforceable.

Putting the clear lack of enforceability based on flawed biological understanding aside, it serves no national nor economic interest for the Department of State to prevent citizens from changing their gender marker on their passports.

Further, a transgender man who has taken testosterone for more than a few months will have 'biologically male characteristics' including a deep voice, facial hair, and increased musculature. Preventing this person from putting M on a passport will only create confusion and delay when a masculine person presents a passport that says F.

This proposed change will not improve the ability of US citizens to travel, will not improve the safety of our nation, and does not rest on any foundation of scientific validity.