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Comments in response to Comments Application for US Passports

Title of Information Collection: U.S. Passport Renewal Application for Eligible Individuals.

OMB Control Number:1405-0020.

Form Number:DS-82.

COMMENTS: The first round of executive orders (1) directs that passports shall reflect the sex of the individual, which is determined based on the relative size of the reproductive cell they produce at birth (2).

Besides the obvious, that we don't test for this metric at birth, even if we did, such determination and measurement of the size of a person reproductive cell would clearly be classified as medical information and likely subject to HIPPA.

Satisfaction of definitions of male and female are unobtainable. Again, biological metrics are not measured at conception and therefore no individual meets the EO 14168 definitions. Moreover, phenotypes are distinct from genotypes and are influenced by exogenous factors. For example, certain hormones can physically change a neonates' biology and gender determination. Transgender is a natural state of our wonderfully complex biology.

Medical transitioning is part of a person's medical history and consistent with our current culture (HIPPA/Dr-patient confidentiality), a person's status as transgender should not be disclosed against a person's will as is what would happen with the proposed gender marker changes.

We are well aware that some individuals have ambiguous genitalia and/or no ability to generate reproductive cells. Not that it's anyone's business, but these individual's gender is not assignable at birth. This fact means that the passport process will be inaccessible to some individuals.

The new E.O. creates unequal standards of passports for cis-gender and trans-gender individuals. Cis-gender individuals will continue to enjoy a passport that matches their outward presentation while trans-individuals will get a passport that contradicts their outward presentation. Therefore, people will be treated unequally under this new process and the result will be that people have different standards for information exhibited on their passports. Hence, the reliance of the passport will be different for some individuals.

These proposed changes will cause intentional harm to transpeople by disclosing that they are transgender. Because of practices embodied in these E.O.s and misinformation spread by this administration, transpeople will be subject to additional violence by outing them on their passports. The rate of violent crimes against transpeople is known, and to intentionally and knowingly out people's transgender status (millions of people in the US), will intentionally and knowingly put them in danger. For the same reasons as above, these proposed changes will cause imminent physical and mental harm to transpeople by disclosing that they are transgender.

These proposed changes would weaken the passport as an identity document. If a person does not look like the gender on their passport, the passport will be under scrutiny. And, each person should have a passport with the same level of value as an identity document. . Everyone should have a passport of equal value. Anything less is discrimination on its face.

There is no showing of harm with the current passport system. The proposed changes will subject people to harassment, abuse, and violence.