

Author Full Name : Timothy Wong**Received Date :** 03/03/2025 11:40 PM**Comments Received :**

I oppose the proposed change to form DS-82, which replaces "gender" with "sex" assigned at birth.

This change not only needlessly changes an existing form but also damages its effectiveness at performing its intended purpose. The purpose of a passport document is to certify a person's *identity* and nationality for international travel. (ref: <https://www.merriam-webster.com/dictionary/passport>). It should follow that the passport contain information relating to a person's identity, such as their gender *identity*, rather than data regarding their biological origins.

The primary use of any passport is within airports and other travel facilities where they are inspected by travel security staff. Changing the meaning of the field not only creates difficulties for security staff who would have to process different documents differently, but will also lead toward the field being ineffective for the purposes of security enforcement.

As defined by Executive Order 14168 the "sex" of a person is defined by the production of male or female reproductive cells or organs at birth. Note that said executive order does not associate a person's sex with any other physical traits. Not only is it impossible for a member of travel security staff to determine this information, it would be an insanely gross violation of privacy and human decency to inspect an individual's reproductive organs in an attempt to cross-verify with a person's listed sex. The proposed change to form DS-82 moves us one step closer to that nightmarish reality.

Information regarding a person's biological sex at birth is better suited for a document such as a certificate of birth, whose explicit purpose is to record and prove the biological origin of a person. Note that a certificate of birth is NOT an acceptable form of identification by TSA standards. This is because it does not certify a person's *identity*, only their biological origin.

As an American citizen I feel that my safety is being protected when travel security staff are able to perform their jobs effectively. The proposed change would limit the effectiveness of travel security staff because it is impossible for them to legally or physically determine the presence of reproductive organs at birth for individuals passing through security checkpoints.

One of the MOST important features of a passport is an identifiable and recognizable photo of the individual owning the passport. Changing form DS-82 from "gender" to "sex at birth" would be akin to replacing this photo with a photo of the person at birth, as a newborn. Obviously, this photo would be meaningless for identifying the person as a traveler, and would render it an ineffective document for its purpose.

Logistically, this change also flies in the face of international passport standardization, as it would deviate from the meaning of this passport field for passports from other major developed nations such as Canada, Australia, Denmark, Germany, India, Ireland, etc. It also creates a bureaucratic nightmare for any persons who will have multiple passports with different sex/genders listed on them due to the change.

Despite the proposed change to form DS-82 being intended to support executive order 14168, by diluting the meaning of the affected passport field it actually moves us toward a world of "gender confusion" where one person can own legal documents with different sexes listed on them.