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ICAO Doc 9303 Part 4 (attached), table 4.1.1.1, says under specifications for field 11/II:

Sex of the holder, to be specified by use of the single initial commonly used in the language of the State or organization where the document is issued and, if translation into English, French or Spanish is necessary, followed by an oblique and the capital letter F for female, M for male, or X for unspecified.

This specification text clearly indicates that the ICAO standard for machine-readable travel documents contemplates the non-specification of the holder's sex, by providing "X" as the initial to be used for "unspecified." The claim in the Changes Since Last Renewal section of the Notice published in the Federal Register (2025-02648) that:

The U.S. Passport conforms with the standards set by [...] the International Civil Aviation Organization, which among other things determine[s] the various fields on the passport's biographical data page.

clearly is not a basis to refuse to include an option explicitly provided for by the applicable ICAO standard. This change is then clearly based only on Executive Order 14168, and I object to the Department's deceptive framing of this change as being partially to comply with international standards. I also note that no ICAO standard applies to the language used on passport applications, only on the passport itself, so the Department has no ICAO obligation to use the term "sex" on DS-11.

(This comment duplicates a portion of a comment submitted via Regulations.gov, tracking number m7f-ebca-3twl.)