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My comment is in response to the proposal issued by the State Department on February 14, 2025, to update form DS-11, "Application for a U.S. Passport" (OMB control # 1405-0004).

I am a US citizen living in Baltimore MD. I oppose the changes proposed by the U.S. State Department, which include replacing the term "gender" with "sex", and requiring "biological sex at birth", with the only two options available being M or F (no longer allowing an X marker).

I currently hold a passport with an X gender marker. My driver's license, birth certificate, and social security all have an X gender marker. I have a complete suite of identity documents, all issued legally, which match and allow me to perform basic transactions in my life including providing proof of identity, proof of citizenship, and right to work in the United States.

The proposed changes will make my life more difficult. I will not be able to renew my passport easily because I have no legal documentation that carries a M or F gender marker. The time estimate provided by the government is completely insufficient to account for the time required for me to figure out how to navigate this situation, or for an initial application being denied due to insufficient information.

Further, the government has not demonstrated why this is necessary for the proper functions of the Department. I was legally issued a passport with an X gender marker and the department seemed to function just fine. It is illogical for the Department to introduce changes that increase burden on citizens, increase the amount of time required to use these forms, without having some clear improvement to the government processes. In fact, it will make processes more confusing to the government since how are they going to deal with my paperwork when I can't provide a legal document with an M or F marker? Will they reject my birth certificate, also legally issued? Staff discretion will be required which is no way to handle such an important document.

It will also reduce the quality and clarity of the information collected, because it will not be substantiated with other legal documents. That information will be less useful to people using my passport since my passport is used for proof of identity and should represent how I look now, not what I looked like 44 years ago when I was born.

The proposed changes are unjustified because they are not required for the proper function of the department and increase burden on people like me in the general public. All this does is make life harder for transgender Americans. Intolerance is not a value of the State Department. I oppose the proposed changes, and request that the Department instead continue to collect gender information with M, F, and X as options.