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I am writing to express my opposition to the proposed revisions to Form DS-5504 as outlined in the Federal Register notice. The proposed changes raise significant concerns regarding necessity, accuracy, clarity, and undue burden on applicants. My objections are as follows:

1. Necessity: The proposed revisions do not enhance the Department's ability to fulfill its mission. Requiring applicants to disclose their biological sex at birth is unrelated to the core function of issuing passports. Current policy, which allows for gender marker updates based on legal documentation, is already sufficient for identification purposes. These changes do not improve the Department's efficiency or security measures but instead create unnecessary hurdles and safety risks for applicants. Aside from transgender citizens who will be put in danger and potentially denied the right to travel because their passport does not match their appearance, all modern sciences proves the existence of sexes beyond binary male and female. These intersex people will be excluded and erased from public life, and the government's identification of its citizens will be less accurate following the proposed changes.

2. Impact: Replacing "gender" with "sex" on Form DS-5504 reduces clarity and may introduce inconsistencies with other federal and international standards. Many federal agencies, including the Social Security Administration and the Transportation Security Administration, as well as state agencies, recognize gender markers based on self-identification rather than birth assignment. The proposed change risks creating confusion for applicants and potential discrepancies between official documents.

Additionally, the updated terminology does not align with International Civil Aviation Organization (ICAO) standards, which allow for an "X" gender marker. Removing the existing flexibility from U.S. passport applications may create barriers for individuals whose legal identity documents include an "X" designation. This inconsistency undermines the stated goal of aligning with international standards and will interfere with future tourism, discouraging travelers from coming to the United States and feeding already existing boycotts over this unpopular policy.

3. Unnecessary Burden: The proposed changes impose an unnecessary burden on applicants without leveraging available technology to streamline the process. Rather than requiring manual affirmations and birth certificate reviews, the Department should explore digital verification methods that cross-reference existing federal and state databases. Automated systems could reduce errors, improve processing efficiency, and minimize the administrative burden on applicants and Department personnel alike.

Furthermore, these changes disproportionately impact individuals who need to amend their passports, potentially delaying international travel and complicating legal processes. If the Department insists on modifying the form, it should provide an electronic process for applicants to submit required documentation rather than relying on outdated paper-based verification methods.

The proposed changes to Form DS-5504 are unnecessary, burdensome, and fail to improve the efficiency or security of passport issuance. They introduce inconsistencies with federal and international identification standards, create undue hardships for applicants, and do not effectively utilize available technology. I urge the Department of State to reconsider.