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New York, NY ██████████

March 18, 2011

Alexys Garcia
U.S. Department of State
2100 Pennsylvania Ave. NW, Room 3031
Washington, DC 20037

Re: Biographical Questionnaire for U.S. Passport, DS-5513

Dear Ms. Garcia:

I write in comment to the proposed form DS-5513, "Biographical Questionnaire for a U.S. Passport," no OMB control number, per *Federal Register* notice 2011-4154 of this past February 24.

I believe that this form is flawed in several regards and should not be used, or, alternatively, should be modified.

My primary objection to this form is that it is completely unnecessary and extremely burdensome. The requirement to provide a **complete** residential, employment, and educational exceeds even that needed for a security clearance—and here the goal is not to demonstrate any special trust but merely to issue a passport, which is the right of any U.S. citizen. The form, if it must exist, should be redesigned and limited only to ask for information actually strictly necessary to verify U.S. citizenship and issue a passport.

It is also extremely unrealistic to expect that most applicants could furnish the requested information in only 45 minutes, as the form currently suggests possible. Even determining the exact address and dates of attendance of a single elementary school could take much research for anyone with a less-than-perfect memory. Determining the name of the doctor who provided post-natal medical care may be impossible in many cases. Completing the entire form would be extremely time-consuming. It is thus likely that some people would decline to fill out the form and thus be effectively denied the U.S. passport to which they may be entitled.

Also troubling is the lack of any public policy for deciding who would receive this form or what would be done with any responses received. In the absence of any such policy, it is possible that this form will be distributed based on some illegal criteria, such as applicants' apparent ethnicity or political views.

For all of the above reasons, I again recommend that the proposed form DS-5513 not be issued, or, if it must be issued, that it be simplified and shortened, and that clear guidelines be issued for its use.

Sincerely,



Michael Castleman