



Duke Grimes, Public Policy Director
Mid-States Distributing
2800 Meacham Blvd,
Fort Worth, TX 76137
dgrimes@msdist.com/406-468-4695

Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF)
Attn: Regulatory Division
99 New York Avenue NE
Washington, DC 20226

9/19/25

Re: Public Comment on Regulatory Notice 2025-14775

Dear ATF Regulatory Division,

On behalf of more than 450 federally licensed firearms dealers represented by our members, we are submitting comment regarding proposed changes to the National Tracing Center (NTC) trace request process. We fully support the ATF's mission to enhance public safety through efficiencies in firearm tracing and applaud the efforts to handle the anticipated increases. At the same time, anticipated increases in trace volume may impose significant operational burdens on dealers. We respectfully urge consideration of modest flexibility measures that help preserve both public safety and practical compliance.

The projected surge in trace requests—rising from an estimated 24,490 to some 510,000 annually—would dramatically increase the burden on dealers, as reflected in the corresponding increase in annual burden hours (from approximately 2,449 to 51,000) ATF. This increase could strain staffing resources and elevate operating costs, particularly for smaller dealers with limited staffing or administrative flexibility.

While we understand the necessity of the collection of information via ATF Form 3312.1 for the ATF to properly perform its vital function, and need for standardization due to the LEA burden estimate, we have a couple of suggestions which may be valuable in that they aim to improve the efficiency and reliability of the overall trace response.

First, a main concern for us is the point of contact for trace requests. Our experience is that those requests may often arrive at different locations, whether it be one of the responsible persons or even a business address. This may be a particular issue for multi-FFL entities and larger dealers. A uniform

www.msdist.com

682-777-0949
2800 Meacham Blvd
Fort Worth, TX 76137



point of contact would strengthen compliance, improve response times, and reduce the likelihood of missed requests.

To improve the efficiency and reliability of the trace process, each FFL should identify to the ATF National Tracing Center a primary point of contact responsible for receiving and coordinating responses to all trace requests. The ATF should direct trace requests to this designated POC, unless the licensee has notified the NTC in writing of a change in that designation. Entities holding multiple licenses may designate a centralized compliance office as the POC, provided they can coordinate timely access to required acquisition and disposition records for each license.

Secondly, to enhance the quality and utility of the collected information, the ATF should emphasize and potentially mandate clear classification of trace requests by LEAs. The NTC already distinguishes between “urgent” and “routine” trace requests and has differing response times for both: less than 24 hours ATF for urgent requests and 5 to 10 days, depending on source for routine requests. These distinctions provide a precedent and framework upon which and even more flexible compliance could be constructed—without undermining investigative needs.

To alleviate excessive burdens on firearms dealers while preserving investigative effectiveness, we propose the following:

a. Extended Response Timeframes for Routine Traces

- Align dealer response obligations with NTC's own schedule: allow up to five business days for routine traces, mirroring the NTC's longer completion window.
- Maintain 24-hour response requirement for “urgent” traces, ensuring rapid investigative support where needed.

b. Clear Trace Priority Designations

- Encourage law enforcement agencies to classify trace requests explicitly as “Urgent” or “Routine” — a field already exists on ATF Form 3312.1 (Question 1b: “Trace Priority”), which is currently used to justify urgent trace status (e.g., assault, kidnapping, homicide).
- Where a request is marked “Routine,” ATF should signal this designation when contacting FFLs, allowing dealers to plan their responses more effectively.
- Ensure the 24-hour response requirement is reserved for cases involving immediate and serious investigative needs (e.g., assault, kidnapping, homicide, etc.) Further clarity could be gained by providing updated definitions or examples to LEAs on when a trace truly justifies “Urgent” status.

c. Streamlined Process for Routine Traces

- For routine traces, consider simplified communication—e.g., standardized electronic notifications or batching—so dealers can respond in a single consolidated effort, reducing administrative overhead.

www.msdist.com

682-777-0949

2800 Meacham Blvd

Fort Worth, TX 76137



- Encourage use of NTC Connect or eTrace Direct API for dealers who already participate, enabling real-time retrieval and faster response—particularly valuable during high-volume periods.

These adjustments would preserve prompt responses where needed, while allowing dealers to manage operational demands more sustainably. Structured flexibility—anchored in existing NTC procedures—mitigates unintended economic disruption without compromising investigative integrity.

These comments are submitted in the spirit of collaboration—supporting ATF’s vital public safety mission, while proposing pragmatic enhancements that reflect operational realities faced by firearms dealers. I welcome further engagement and discussion to help achieve a balanced, effective compliance framework.

Thank you for your consideration and for continuing to engage with the firearms industry on these important initiatives.

Respectfully submitted,

Duane “Duke” Grimes
Mid-States Policy Director



www.msdist.com

682-777-0949
2800 Meacham Blvd
Fort Worth, TX 76137