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

9/19/25

Subject: Public Comment on Regulatory Notice 2025-15507 – Revision of the NFA Responsible Person Questionnaire (ATF Form 5320.23), published August 15, 2025

Dear ATF Officials,

On behalf of more than 450 federally licensed firearms dealers represented by our members, we applaud the ATF's thoughtful and forward-looking revisions to Form 5320.23 as proposed in Notice 2025-15507. These changes reflect a clear commitment to modernizing regulatory processes while strengthening both public safety and operational efficiency.

The move to electronic filing and acceptance of digital signatures streamlines submissions and reduces delays—an important step toward timely, accurate compliance. The option for electronic fingerprints and reduced reliance on hard-copy submissions will significantly cut administrative burdens and allow FFLs to focus more time on serving customers and maintaining compliance.

We also appreciate the form's clearer design and improved instructions, including:

- A streamlined title and simplified formatting;
- Removal of the photo box and allowance of ID cards in place of passport photos;
- Consolidated race/ethnicity fields; and
- Instructional updates tailored for trusts, corporations, and married couples acting as joint applicants or transferees.

These refinements make the form more accessible, reduce errors, and better accommodate diverse ownership structures while supporting lawful participation.

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Importantly, this effort aligns with ATF's broader reform agenda to streamline forms (e.g., Forms 20 and 4473), integrate digital signatures, and improve consistency across regulatory processes. Greater uniformity enhances predictability, compliance, and operational readiness for FFLs nationwide.

We recognize these improvements may require upfront investments in training, updated workflows, and IT systems. We appreciate the planned transition period and encourage ATF to supplement it with practical resources such as user-friendly guides, FAQs, and short training materials to ensure smooth adoption.

In summary, we strongly support Notice 2025-15507 and the modernization of ATF Form 5320.23. The enhanced efficiency, clarity, inclusivity, and alignment with ATF's reform efforts represent meaningful progress that will deliver long-term benefits for accuracy, efficiency, and shared compliance.

Thank you for your leadership and for continuing to engage with the firearms industry on this important initiative.

Respectfully submitted,

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