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To Whom It May Concern,

We appreciate the opportunity to respond to changes in the NFA regulations for 2026 as a result of the passing of the Big Beautiful Bill in 2025.

As a licensed FFL, we regularly utilize ATF's eform system to submit both eform 3 and eform 4 during our daily course of business. We would welcome improvements to the system that would reduce the burden of submitting eforms. It appears a few aspects will be addressed, such as removing the sheriff's dept notification among other issues or concerns.

A few improvements we suggest below would greatly improve the efficiency of the form submissions throughout the industry.

1. Implement the ability to submit multiple NFA items with one single eform 4 submission. Currently, each eform 4 must be submitted independently for the same individual or entity receiving the NFA items, which requires similar effort/burden for the identical information to be submitted, other than the NFA item information. Eform 3 has this capability and the capability should be implemented for eform 4s.

2. Implement online completion and submission of form 5320.23 (NFA Questionnaire) for other entities such as Trusts. Currently, the system requires the submission of the questionnaire for all responsible persons within an entity, such as a trust. Even if the entity is only one individual, the questionnaire must be completed outside the eform system (in our case, we have the responsible person complete, including attaching a photo and signing a PDF version of the questionnaire) to then upload to the eform. Entities with more than one responsible person require the same amount of work/effort for each person, including a new form with current photo, completed and signed for each individual. Implementing the ability to complete this form within the eform system would greatly improve efficiency of eform 4 submissions for trusts and similar entities, which we believe to consist of an estimated 25-50% of eform 4 submissions in our industry. Eform 4 trust submission require an estimated 1.5X-3X the time required for individual eform submissions, potentially longer if there are 3 or more responsible persons.

3. Allow for corrections to submitted forms. The current system does not allow for corrections made to the eform after submission. Any simple mistakes must require a new form submission, whereas the paper forms allow for corrections and mailing back for assessment. Any resubmissions of an eform put the form back in the standard queue.

4. Removal of photo and fingerprint requirement for eform submission. The individual's info is already entered, personal info, SSN, etc. is part of the form. Taking a photo and uploading the photo to the eform system requires additional burden on the completion of the form. Likewise capturing fingerprints (especially from individuals with physical limitations) and uploading them to the eform system also require additional burden.

Thank you for the opportunity to respond with information from real-world experience completing and submitting eforms.