



NATIONAL SHOOTING SPORTS FOUNDATION, INC.

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LAWRENCE G. KEANE
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March 28, 2012

VIA FACSIMILE
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Office of Management and Budget
Office of Information and Regulation Affairs
725 17th Street, N.W.
Washington, D.C. 20503

**Re: 30-Day Notice of Information Collection: Identification Markings Placed on Firearms.
77 Fed. Reg. 17503 (Mar. 26, 2012). OMB Number 1140-0050.**

To Whom It May Concern:

The National Shooting Sports Foundation (NSSF), the trade association for the firearms, ammunition, hunting and shooting sports industry, welcomes this opportunity to share with you our comments on the Bureau of Alcohol, Tobacco, Firearms and Explosives' (ATF) information collection request concerning identification markings placed on firearms, which was published in the Federal Register on March 26, 2012.

Each licensed firearms manufacturer or licensed importer must legibly identify each firearm by engraving, casting, stamping (impressing), or otherwise conspicuously placing on the frame or receiver an individual serial number. Also, ATF requires minimum height and depth requirements for identification markings placed on firearms. ATF estimates that 2,962 respondents will take only five seconds to mark each firearm for overall 2,500 total burden hours associated with this collection. Both the time it takes to mark each firearm and the overall burden in hours on our manufacturers and importers are grossly underestimated.

Through conversations with our manufacturer and importer members, we have determined that the process of marking each firearm could take as long as one to two minutes depending on the machinery and process used. Although a certain machine may be able to impress its mark upon a firearm in five seconds, it is important to calculate the steps involved in transporting the firearms to and from the machine, as well as the time it takes to load and unload each firearm from the machine in order to obtain a realistic number. And, when considering that some of the smaller manufacturers and importers may do all of this by hand, the time involved increases.

PROMOTE

PROTECT

PRESERVE


According to ATF's Annual Firearms Manufacturers Export Report (AFMER) data from 2010, our industry manufactured 5,459,240 firearms. According to the United States International Trade Commission's data, our industry imported 2,331,832 the same year. This means that, as an industry, we marked 7,791,072 firearms in 2010. Even if the process only took five seconds as ATF suggests, it would take 10,281 hours to mark each of those firearms -- four times longer than ATF's estimated 2,500 man hours. Taking into account a more reasonable time to mark estimate of one minute, the total estimated burden jumps to an estimated 123,372 man hours (at least 60 employees working on nothing but marking firearms) per year.

Estimated hours for markings using 2010 figures	
AFMER 2010 MANUFACTURED	5,459,240
USITC 2010 IMPORTED - EXPORTED	2,331,832 +
TOTAL FIREARMS 2010	7,791,072 =
Multiply 5 seconds per unit	38,955,360 seconds
Divide by 60 to equal minutes	649,256 minutes
Divide by 60 to equal hours	10,821 hours

Sources: AFMER & USITC

Our industry willingly complies with ATF regulations and continues to properly mark each of the firearms it manufactures and imports. We feel it is necessary, however, for both the Office of Management and Budget (OMB) and ATF to appreciate the true burden undertaken by our industry.

Sincerely,



Lawrence G. Keane

CC: John Spencer, ATF Firearms Technology Branch