



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

Washington DC 20226

April 2, 2012

www.atf.gov

Mr. Larry G. Keane
National Shooting Sports Foundation, Inc.
11 Mile Road
Newtown, Connecticut 06470-2359

Dear Mr. Keane:

This is in reference to your correspondence dated March 28, 2012, to the Office of Management and Budget (OMB) in which you provided comments to the 30 Day Notice of Information Collection regarding OMB Number 1140-0050: *The Identification of Markings Placed on Firearms*, 77 Federal Regulation 17503.

In your correspondence, you state that the figure provided by the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) for the time needed to mark firearms is underestimated. You also maintain, based on conversations with the licensed manufacturers and importers your foundation represents, that the process of marking each firearm could take as long as 1 to 2 minutes depending upon the machinery and process used. You do agree that certain machines can mark firearms in 5 seconds as previously reported and approved in the past, but additional time should be taken into consideration for the entire procedure of transporting, loading, and unloading machinery.

You also reference ATF's *Annual Firearms Manufacturers Export Report* (AFMER) and the data from the 2010 study submitted by United States International Trade Commission (USITC). These two reports indicate that a total of 7,791,020 firearms were manufactured or imported/exported into the United States. We should point out that the data derived from these studies does not take into consideration those importers who have their firearms marked overseas by foreign manufacturers. Also, the USITC report contains statistics with respect to exported firearms which would have been reported as manufactured in the AFMER.

Mr. Larry G. Keane

However, based on the information that you have furnished on behalf of your members, ATF will accept your argument for using *1 minute* as the indicator of time required for transporting, loading, marking, and then unloading machinery to ensure the proper marking of firearms under 27 CFR 478.92.

In conclusion, ATF appreciates your taking time to gather information from your membership and looks forward to continuing our constructive relationship. If you should have any questions, please contact me at anytime.

Sincerely yours,

A handwritten signature in black ink, appearing to read "C Yoder". The signature is fluid and cursive, with the first letter "C" being large and stylized.

Chad J. Yoder
Chief, Firearms and Explosives Industry Division