**From:** Lallemand, Chad A.
**To:** Butler, Rhonda M.
**Subject:** FW: public comment
**Date:** Thursday, January 17, 2013 2:55:52 PM

---

Hi Rhonda,

Can you please respond to this comment?

Thanks,
Chad

---

**From:** FN-OMB-OIRA-Submission
**Sent:** Thursday, January 17, 2013 2:54 PM
**To:** Lallemand, Chad A.
**Subject:** public comment

---

**From:** TALON Ordnance [mailto:clay@talonordnance.com]
**Sent:** Monday, January 14, 2013 9:28 AM
**To:** FN-OMB-OIRA-Submission
**Subject:** OMB Number 1140-0018

If I understand the request for comment correctly, the request is asking for input on the extension of information collection already approved, and an estimation of the time burden to complete such information.

When I completed the form, the information collected was reasonable, and I find no reason not to extend the information collected on the AFT form 7.

However, the estimated time burden of 1 hour 15 minutes is very low. There is no way that a person can complete the requirements of form 7 in that amount of time. You must take into account the request for fingerprint cards in duplicate, and passport photos to accompany the completed form, because this information is asked for on the form. So, unless an applicant has a fingerprinting station and a photo booth in their home, this information requires time to complete. I estimate that I spent in excess of 3 hours collecting all the required information for form 7. And that does not count travel to and from locations necessary to comply with the requirements of the form.

A suggestion, if one would be accepted, is to digitize ALL fingerprint card submissions to the Department of Justice. I have submitted fingerprint cards to the DOJ so many times I can't count, and yet every time I must resubmit for the cards to be run through the system again. This is grossly inefficient, especially given the digital age in which we live. Similar to the DOD DNA database, once a sample is on file, you should not have to resubmit. Understanding that it is possible for fingerprint anomalies to occur due to accidents or scars that affect the collection of data, perhaps a fingerprint submission could be good for a given number of years. But, requiring repeated

fingerprint card submissions for a form 7 when the DOJ just received a set of cards a few months prior for a concealed carry application, just as an example, is an extreme waste of time for both the agency and the individual. I hear this complaint from customers routinely, and it seems clear that such would reduce the agency's burden as well.

Respectfully,

Clay Baldwin
President
TALON Ordnance

TALON Ordnance
165 Victoria Place
Madison, MS 39110
(601) 238-1258