

OMB Comments 5320.20 60 Day Posting									
Comment #	Date of Submission	Commenter	Contact Information	Form #	Item #	Current	Proposed	ATF Response	Date of Response
1	6/24/2019	Kristy Dimier Regulus Global, LLC.	kdimier@regulusglobal.com	5320.20	General Question as to whom should file		Adding clarification instructions on whom should file or renaming the form	GSB Chief David Howell has since spoken with the commentor. None of the suggested changes will be made to the form at this time.	6/25/2019

From: [NFA OMB Comments](#)
To: [Kristy Dimier](#)
Subject: RE: Comments on ATF F 5320.20
Date: Tuesday, June 25, 2019 10:53:00 AM
Attachments: [image002.jpg](#)
[image004.jpg](#)
[image001.jpg](#)

Thank you for your comments. ATF will be reviewing each and providing an official response at a later time.

Please let me know if you have any further questions or comments.

Regards,

James Chancey

Program Analyst/COR
National Firearms Act Division
Bureau of Alcohol, Tobacco, Firearms and Explosives
U.S. Department of Justice

james.chancey@atf.gov

From: Kristy Dimier <kdimier@regulusglobal.com>
Sent: Monday, June 24, 2019 2:23 PM
To: NFA OMB Comments <NFAOMBCOMMENTS@atf.gov>
Subject: Comments on ATF F 5320.20

Mr. Chancey,

First, let me start by saying that myself and another compliance colleague found the ATF F 5320.20 to be a little confusing. I believe having "This form is intended for Persons other than qualified FFL (licensee) or government agencies" or for "Non-licensees" would be beneficial. Or, perhaps renaming the form Non-licensee Application to Transport Interstate or to Temporarily Export Certain National Firearms Act (NFA) Firearms. Upon reading the instructions and reviewing the form it appeared that we should've been filling this form out. The first instruction (a) should have the above information as well just as reinforcement as to who is required to fill it out to avoid any confusion.

I don't understand why blocks 9 thru 11 state they shall be completed if firearm(s) is/are being temporarily exported. It's my understanding the temporary exports/imports fall under DDTC jurisdiction not the ATF. A DSP-73 gives the authorization for the temporary export and subsequent import. This section further confused me seeing this and a block for the State Department License No.

I had to inquire about the use of this form with Ted Clutter and David Howell who clarified the form. Ted had to email the regulation 478.28 with (c) highlighted stating "This section **shall not** be

construed as requiring licensees to obtain authorization to transport etc etc". I now understand as a licensed FFL we are not responsible for submitting this form.

Thank you for your time accepting the public comments concerning the ATF F 5320.20.

Have a great afternoon!



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