

To: ATF Technology Branch  
Subject: 1911 Grip and Chassis System

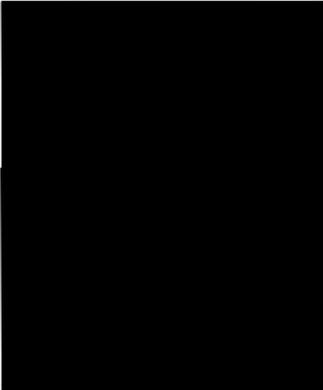
EVAL. 311-827

Dear Sirs,

Submitted in this package is a two part pistol project that includes a grip module and pistol receiver chassis system that is accompanied with the formal request letter from our attorney [REDACTED]. Please review and let us know if you have any questions. I can answer technical questions if need be via email or my cell phone below.

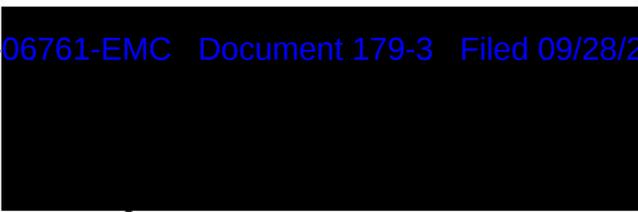
For clarity, the final production system will be a Stainless Steel Chassis Receiver coupled with a polymer injection molded (glass filled nylon) grip module.

Sincerely,



ONE  
PISTOL Frame  
w/ INSERT Receiver

RECEIVED  
AUG 22 2019  
BY: FATD



July 17, 2019

Bureau of Alcohol, Tobacco, Firearms, and Explosives  
Firearms Technology Branch  
244 Needy Road  
Martinsburg, West Virginia 25405 USA  
VIA FED-EX

RECEIVED  
AUG 22 2019  
BY: FATD

Re: IN RE: PF1911X FIREARM DETERMINATION FOR MARKING PURPOSES

To whom it may concern:

I write regarding my client, [REDACTED] and their intent to manufacture a firearm, the [REDACTED] which incorporates a fire control assembly chassis system that incorporates the entire fire control assembly within a molded grip. Specifically, we are asking for classification as to which component of the fire control assembly chassis system and/or grip [REDACTED] is the "firearm," "firearm frame," or "firearm receiver" as defined in 18 U.S.C. §921(a)(3) requiring the requisite markings.

**REQUIRED MARKINGS**

27 C.C.R. 478.92 mandates that firearms manufactured by licensees be appropriately marked. Specifically, it provides:

(a)(1) Firearms. You, as a licensed manufacturer or licensed importer of firearms, must legibly identify each firearm manufactured or imported as follows:

(i) By engraving, casting, stamping (impressing), or otherwise conspicuously placing or causing to be engraved, cast, stamped (impressed) or placed on the frame or receiver thereof an individual serial number. The serial number must be placed in a manner not susceptible of being readily obliterated, altered, or removed, and must not duplicate any serial number placed by you on any other firearm. For firearms manufactured or imported on and after January 30, 2002, the engraving, casting, or stamping (impressing) of the serial number must be to a minimum depth of .003 inch and in a print size no smaller than 1/16 inch; and

(ii) By engraving, casting, stamping (impressing), or otherwise conspicuously placing or causing to be engraved, cast, stamped

July 17, 2019

(impressed) or placed on the **frame, receiver, or barrel thereof** certain additional information. This information must be placed in a manner not susceptible of being readily obliterated, altered, or removed. For firearms manufactured or imported on and after January 30, 2002, the engraving, casting, or stamping (impressing) of this information must be to a minimum depth of .003 inch. The additional information includes:

(A) The model, if such designation has been made;

(B) The caliber or gauge;

(C) Your name (or recognized abbreviation) and also, when applicable, the name of the foreign manufacturer;

(D) In the case of a domestically made firearm, the city and State (or recognized abbreviation thereof) where you as the manufacturer maintain your place of business; and

(E) In the case of an imported firearm, the name of the country in which it was manufactured and the city and State (or recognized abbreviation thereof) where you as the importer maintain your place of business. For additional requirements relating to imported firearms, see Customs regulations at 19 CFR part 134.

### FIREARM, FRAME OR RECEIVER

Title I of the Gun Control Act, 18 U.S.C. §§ 921 *et seq.*, primarily regulates conventional firearms (i.e., rifles, pistols, and shotguns). Title II of the Gun Control Act, also known as the National Firearms Act, 26 U.S.C. §§ 5801 *et seq.*, stringently regulates machine guns, short barreled shotguns, and other narrow classes of firearms. “Firearm” is defined in § 921(a)(3) as:

(B) Any weapon (including a starter gun) which will or is designed to or may readily be converted to expel a projectile by the action of an explosive; (B) *the frame or receiver of any such weapon*; (C) any firearm muffler or firearm silencer; or (D) any destructive device. Such term does not include an antique firearm.

As noted, the term “firearm” means a “weapon . . . which will or is designed to or may readily be converted to expel a projectile,” and also “*the frame or receiver of any such weapon.*” (18 U.S.C. §921(a)(3).)

ATF’s regulatory definition, 27 C.F.R. §478.11, provides: “*Firearm frame or receiver. That part of a firearm which provides housing for the hammer, bolt or breechblock, and firing mechanism, and which is usually threaded at its forward portion to receive the barrel.* (The same definition appears in 27 C.F.R. §479.11.) “Breechblock” is defined as the locking and cartridge head supporting mechanism of a firearm that does not operate in line with the axis of the bore.” (*Glossary of the Association of Firearms and Toolmark Examiners* (2<sup>nd</sup> Ed. 1985,

July 17, 2019

21).)

In ordinary nomenclature, the frame or receiver is a finished part which is capable of being assembled with other parts to put together a firearm.” (*Receiver*. The basic unit of a firearm which houses the firing and breech mechanism and to which the barrel and stock are assembled. *Glossary of the Association of Firearm and Toolmark Examiners* (2<sup>nd</sup> ed. 1985), 111.)

#### CHASSIS SYSTEM

utilizes a chassis system that incorporates the entire fire control group, and consists of the following components:

1. Takedown Lever
2. Takedown Safety Lever
3. Slide Catch Lever Pin
4. Trigger Stop Pin
5. Trigger Stop Pin Frame
6. Slide Catch Lever Spring
7. Spring Post,
8. Slide Catch Lever
9. Trigger Bar
10. Safety Lever Pin
11. Trigger
12. Sear Housing Roll Pin
13. Sear Housing Assembly
14. Sear Pivot Pin
15. Trigger Bar Spring

When assembled, items 1 through 4, and 6 through 10 are all contained within item 5 - the Trigger Stop Pin Frame (See Figure 1 above). Collectively, these items compose the fire control group. When assembled, the fire control group is fitted into the grip (See Figure 2, below.)

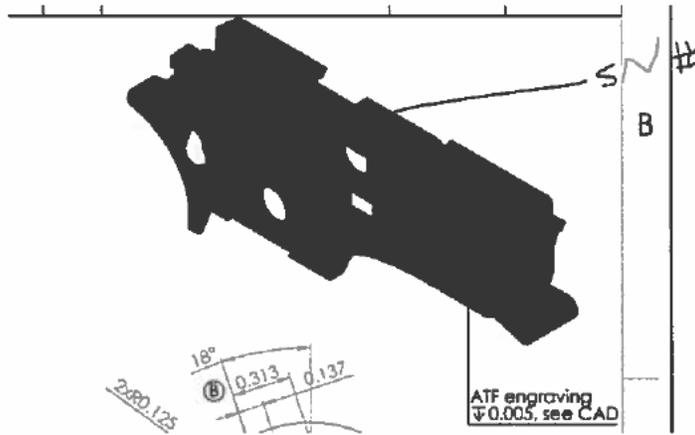
It is our understanding and contention that 27 C.F.R. §478.92 mandates the requisite markings be engraved on the Trigger Stop Pin Frame, as depicted in Figure 1, as opposed to the modular grip depicted in Figure 2, since the Trigger Stop Pin houses the entire fire assembly group.

We have enclosed exemplars of the Trigger Pin Frame and Modular Grip for your review. Thank you for taking the time to address this issue. We look forward to hearing from you. Please let us know if you have any further questions or concerns. **When complete, please return the submitted parts** If you have any questions or concerns, do not hesitate to contact me at the number above.

Sincerely,

July 17, 2019

**EXHIBIT FIGURES**



**FIGURE 1: TRIGGER STOP PIN FRAME DEPICTED**



**FIGURE 2: TRIGGER STOP PIN FRAME AND MODULAR GRIP**



EVAL.  
313-696



RECEIVED  
MAR 13 2020  
BY:.....  
FA 7D

Dear Examiner,

This package enclosed one "AWAR1 80% Lower Receiver" for import evaluation.

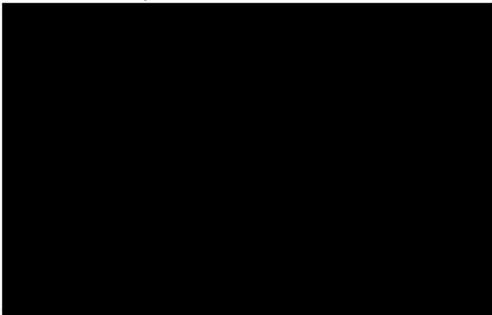
This lower receiver is manufacturer by [REDACTED] Taiwan exclusively and authorized by [REDACTED]

The reason for testing is for import evaluation.

Please return the item after the testing and evaluation if passed with enclosed return shipping label.

We will abandon the part to ATF if did not passed the examination.

Respectfully Yours,





**DEPARTMENT OF JUSTICE**

Bureau of Alcohol, Tobacco,  
Firearms and Explosives

244 Needy Road

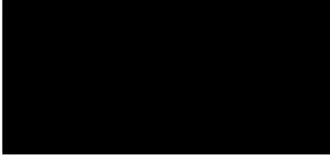
Martinsburg, West Virginia 25405

901030 PC

Ref: [REDACTED]

JAN 0 3 2020

EVAL  
313-696



**RECEIVED**  
MAR 13 2020  
BY: FA 70

Dear Gentlemen,

This is in response to your permit application dated December 27, 2019, to import [REDACTED] AR-15 80% lower receiver into the United States.

The Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) was unable to determine the import status of the firearm(s) or part described on your application from the information provided. The regulations (27 CFR 478.116) provide that the Director may authorize the conditional importation of a firearm or part for the purpose of examining and testing in order to determine the import status.

We have conditionally approved your permit application to allow you to import one (1) [REDACTED] AR-15 80% lower receiver to the Firearms Technology Industry Services Branch (FTISB) for an import evaluation. When submitting a firearm or part to ATF for examination and testing, please enclose the following documentation;

- (1) a copy of this letter;
- (2) manufacturers' information for the firearms or part;
- (3) the reason(s) for testing the firearms or part; and
- (4) any additional information that will assist FTISB in the examination and testing of the firearms or part.

This permit is authorized under the condition that the firearms or part be shipped under U. S. Customs and Border Protection supervision directly to the:

-2-

Director  
Bureau of Alcohol, Tobacco, Firearms and Explosives  
Attention: Firearms Technology Industry Services Branch  
244 Needy Road  
Martinsburg, WV 25405  
(304) 616-4300

If a determination is made that the firearms or part may not be imported, you have three alternatives:

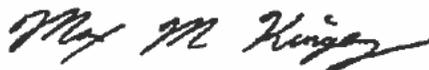
- (1) destroy the firearms or part;
- (2) abandon the firearms or part to ATF or Customs; or
- (3) arrange for exportation of the firearms or part from the United States pursuant to an export license issued by the Office of Defense Trade Controls, Department of State, if existing U.S. Government policy does not preclude the issuance of a license for such exportation.

Samples may be shipped to ATF via FedEx, FedEx Ground or the United Parcel Service. All freight shipments and courier delivery shipments must be coordinated, in advance, with ATF. Please call the Firearms Technology Industry Services Branch at (304) 616-4300. Do not ship any type of ordnance, explosives or hazardous materials to the Firearms Technology Industry Services Branch.

You must provide specific instructions detailing your wishes concerning the lawful disposition of the firearm(s) or part. If such instructions are not received within 60 days of the notification from the Firearms Technology Industry Services Branch regarding the completion of our examination, the firearm(s) or part will be considered abandoned and will be disposed of according to the needs of the Government.

We trust that the foregoing information will be of assistance to you. Should you have further questions or concerns relative to this matter, please do not hesitate to write or call Examiner [REDACTED] and refer to the nine-digit permit number located in the top right hand corner of this letter.

Sincerely yours,



Max M. Kingery  
Chief, Firearms and Explosives Imports Branch

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		stamps and/or REPLY POSTAGE
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3/26/2020

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FROM 65142



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FROM:



**SHIP TO:**  
Bureau of Alcohol, Tobacco, Firearms and  
Explosives  
ATTN: Firearms Technology Industry Services  
Branch  
244 Needy Road  
Martinsburg, WV. 25405-9431

**USPS TRACKING #**



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1 LB POSTAGE & FEES PAID

**PRIORITY MAIL  
POSTAGE REQUIRED**

Director EVAL 315-044

Bureau of Alcohol, Tobacco, Firearms and Explosives

Firearms Technology Branch

United States Department of Justice

244 Needy Road

Martinsburg, WV 25405

304-616-4300 phone

304-616-4301 fax

September 11<sup>th</sup>, 2020

RECEIVED  
SEP 15 2020  
BY: FATD

3d printed  
AR-15 Lower

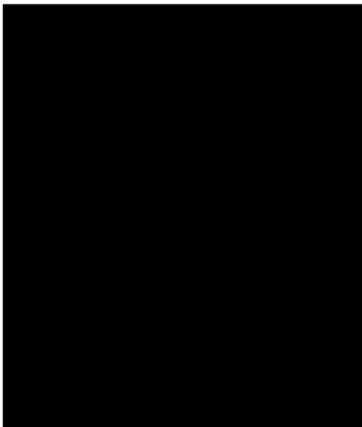
Dear Director,

I am submitting to the FTISB for evaluation one 3D printed AR-15 incomplete lower. I would like for you to make a determination as to the completeness of this sample as to whether it has reached the level of a firearm requiring a serial number or if it is in a state not yet ready as a firearm. Our intent is to have a local injection molding company produce these and hand them off to us for finishing, serializing and use on production firearms. Restated, we need to know if the injection molding company would be required to possess an 07 FFL. This 3D printed item is as we would receive them with the exception being they would have a metal serial number plate molded in place in the space provided above the pistol grip on the left side

If your evaluation determines this is acceptable you may forward the sample to us via our FedEx account number [REDACTED]

If you have any further questions please feel free to contact me at the numbers below.

Best regards,



RECEIVED  
SEP 15 2020  
BY: KATO

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		<b>R023</b>
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[Barcode]		
9410 8112 0255 5937 3173 62		

January 7, 2021

EVAL.  
315-876

RECEIVED  
JAN 20 2021  
FATO  
BY: .....

ATF – Technical dept

Dear Sir,

We would like for you to evaluate these 5 80% receivers, AR-15, AR-10, AR9, AR15 Single Shot and a 1911 to determine if they are classified as a legal firearm or an 80% receiver. I kindly ask for a individual letter with photos for each receiver. I also attached a letter I received from you back in 2013 if needed for reference. Enclosed is a prepaid shipping label to return the samples.

Thank you very much.



Receivers:

AR-9

AR-10

AR-15

AR-15 \$\$

1911

TOTAL: 5



U.S. Department of Justice

Bureau of Alcohol, Tobacco,  
Firearms and Explosives

Martinsburg, WV 25405

www.atf.gov

903050:MCP  
3311/301066

July 16, 2013



RECEIVED  
JAN 20 2021  
BY: FATD

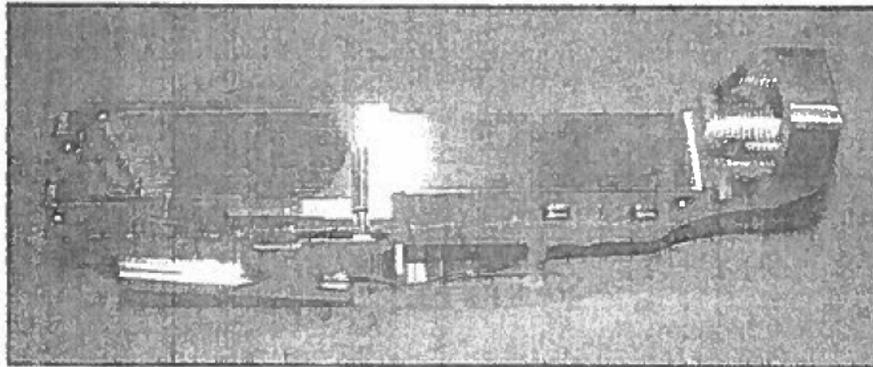
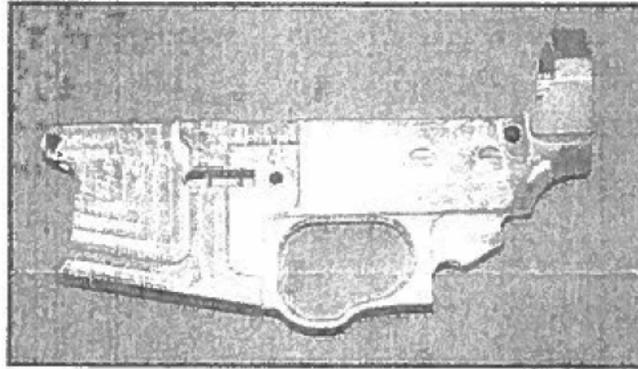
This is in reference to your correspondence to the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), Firearms Technology Branch (FTB), which accompanied your prototype sample of a partially-finished AR-15 type receiver your company intends to manufacture and market. Specifically, you requested an examination and classification of the submitted sample pursuant to the amended Gun Control Act of 1968 (GCA) and asked if this sample would be regulated as a "firearm" under the GCA.

As background, the GCA, 18 U.S.C. § 921(a)(3), defines the term "firearm" to include *any weapon (including a starter gun) which will or is designed to or may be readily converted to expel a projectile by the action of an explosive...[and] ...the frame or receiver of any such weapon....*

Based on this definition, a firearm receiver casting or firearm receiver blank can itself be a "firearm" if completed to the point at which it can be recognized as a firearm frame or receiver.

As you may be aware, FTB has previously determined that an AR-15 type receiver which has no machining of any kind performed in the area of the trigger/hammer (fire-control) recess might not be classified as a firearm. Such a receiver could have all other machining operations performed, including pivot-pin and takedown-pin hole(s) and clearance for the takedown-pin lug, but must be completely solid and un-machined in the fire-control recess area.

Our examination confirmed that the submitted sample has been partially machined, including pivot-pin and takedown pin hole(s). The item incorporates a selector detent hole, but it is completely solid and un-machined in the fire-control recess area (see photos below).



**Submitted prototype sample**

Accordingly, FTB finds that your prototype is not a "firearm" as defined in the GCA. We caution that this finding is based on the sample as submitted. If the design, dimensions, configuration, method of operation, or materials used were changed, our determination would be subject to review.

To facilitate return of the submitted item, please provide FTB with an appropriate FedEx or similar account number within 60 days of receipt of this letter.



We thank you for your inquiry and trust that the foregoing has been responsive to your request.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Earl Griffith".

Earl Griffith  
Chief, Firearms Technology Branch

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**USPS PRIORITY MAIL**

FIREARMS & AMMUNITION TECHNOLOGY  
MIKE WINTERS  
244 NEEDY ROAD  
MARTINSBURG WV 25405

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**USPS TRACKING #**



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FLAT RATE MED BOX

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**USPS PRIORITY MAIL**



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R023

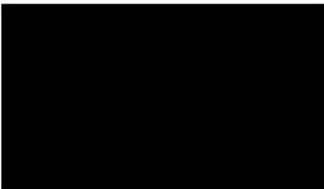
FIREARMS & AMMUNITION TECHNOLOGY  
MIKE WINTERS  
244 NEEDY RD  
MARTINSBURG WV 25405-9431

**1/20/21**

**USPS TRACKING #**



**9405 5368 9523 2524 3674 15**



EVAL:  
315-916

RECEIVED  
JAN 26 2021  
BY: FATD

January 18, 2021

Bureau of Alcohol, Tobacco, Firearms and Explosive  
Firearms Technology Branch  
244 Needy Rd  
Martinsburg, WV, 25405

To whom it may concern:

[Redacted] is voluntarily submitting the enclosed prototype for classification. The company requests a letter ruling determining the classification of the product as a firearm or not a firearm.

This blank receiver was designed using the regulatory guidance available from the EP lower determination letter dated March 4, 2014 from Earl Griffith, Chief of the Firearms Technology Branch (ATF) to [Redacted] and published ATF determination letter from Kenney Enterprises, Inc. dated May 17, 2013 regarding the methodology used in the ATF process.

Our receiver blank was designed to the best of our ability to conform to the legal standards as understood from reviewing the previously mentioned letters and industry best practices.

Our product was designed to have no tooling and/or machining processes done in the trigger pocket area and our manufacturing process does not include the use of additional support while molding. The trigger pocket area is a single-step process and is composed of the same material as the rest of the product. At no time during manufacture is a void created in the monolithic trigger pocket area. The Nylon material is injected in a single process.

Please return the sample in the enclosed packaging. Thank you for your time and consideration.

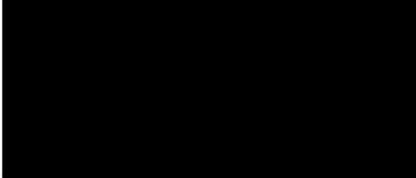
Sincerely,



ONE  
AR-15  
LOWER

Enclosure

**RTN  
LABEL**

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TO:  
**ATF**

**RECEIVED**  
JAN 26 2021  
BY: *FATD*

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EVAL. 316-248

Snyder, Guy J.

From: [REDACTED]  
Sent: Friday, March 12, 2021 4:19 PM  
To: Snyder, Guy J.  
Subject: Sample evaluation

[REDACTED]

3/12/2021

RECEIVED  
MAR 11 2021  
BY: FATD

Dear ATF,

We have sent you a sample part to be evaluated for manufacturing to sell. The part we have sent is an 80% lower small frame AR-10. We can be contacted below.

[REDACTED]

Rec:  
ONE  
AR-10 Lower Receiver

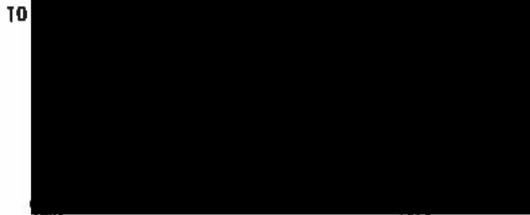
Thank you for your time,

[REDACTED]

ORIGIN ID:WDBA (000) 000-0000  
ATF (ATTN: FTISB)  
FIREARMS & AMMUNITION TECH DIVISION  
244 NEEDY RD. SUITE 1600  
MARTINSBURG, WV 25405  
UNITED STATES US

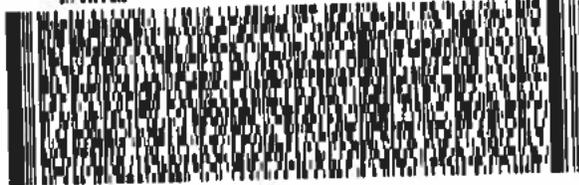
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ACTWGT: 1.25 LB  
CAD: 6991722/55F02121

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Express



07/27/2021 10:21:17 AM

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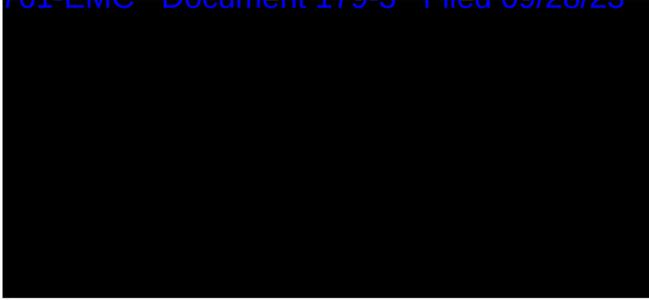
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CA - US



EVAL:  
316-300



March 17, 2021

VIA U.S. MAIL - CERTIFIED

RECEIVED  
MAR 18 2021  
FATD  
BY: .....

Mr. Earl Griffith  
Firearms & Ammunition Technology Division  
Bureau of Alcohol, Tobacco, Firearms and Explosives  
244 Needy Road  
Martinsburg, WV 25405

RE: Request for FATD Classification  
[Redacted]

Dear Mr. Griffith:

Our law firm represents [Redacted] See attached  
POA - you may correspond with us at [Redacted]

[Redacted] Our client has developed a receiver blank [Redacted] which is a Glock 19-Type, non-firearm, receiver blank, not regulated by the 1968 Gun Control Act (18 U.S.C. §921, et seq.) ("GCA") or the National Firearms Act (26 U.S.C. §53, et seq.) ("NFA"). [Redacted] submits this request in an effort to ensure the FATD agrees with [Redacted] position on its classification that the [Redacted] is only a receiver blank, non-firearm, which is not regulated under the GCA or the NFA.

We respectfully request that the Firearms & Ammunition Technology Division ("FATD") confirm our internal conclusion that the [Redacted] as sold, does not meet the definition of "firearm" under the GCA nor the NFA. A sample of the [Redacted] receiver blank as sold is submitted herewith for your review and analysis.

ANALYSIS AND CLASSIFICATION

Applicable Law

The GCA, 18 U.S.C. §§ 921(a)(3) defines "firearm," to mean, in pertinent part:

The term "firearm" means The term "firearm" means (A) any weapon (including a starter gun) which will or is designed to or may readily be converted to expel a projectile by the action of an explosive; (B) the frame or receiver of any such weapon; (C) any firearm muffler or firearm silencer; or

80% FRAME  
KIT  
BUILD  
KIT  
QTY: 1



ATF  
March 17, 2021  
Page 2 of 5

(D) any destructive device. Such term does not include an antique firearm.

The Code of Federal Regulations defines “firearm” further,

*Firearm.* Any weapon, including a starter gun, which will or is designed to or may readily be converted to expel a projectile by the action of an explosive; the frame or receiver of any such weapon; any firearm muffler or firearm silencer; or any destructive device; but the term shall not include an antique firearm. In the case of a licensed collector, the term shall mean only curios and relics.

*Firearm frame or receiver.* That part of a firearm which provides housing for the hammer, bolt or breechblock, and firing mechanism, and which is usually threaded at its forward portion to receive the barrel.

The NFA, 26 U.S.C. § 5845(a), defines “firearm” as:

(1) a shotgun having a barrel or barrels of less than 18 inches in length; (2) a weapon made from a shotgun if such weapon as modified has an overall length of less than 26 inches or a barrel or barrels of less than 18 inches in length; (3) a rifle having a barrel or barrels of less than 16 inches in length; (4) a weapon made from a rifle if such weapon as modified has an overall length of less than 26 inches or a barrel or barrels of less than 16 inches in length; (5) any other weapon, as defined in subsection (e); (6) a machinegun; (7) any silencer (as defined in section 921 of title 18, United States Code); and (8) a destructive device. The term “firearm” shall not include an antique firearm or any device (other than a machinegun or destructive device) which, although designed as a weapon, the Secretary finds by reason of the date of its manufacture, value, design, and other characteristics is primarily a collector’s item and is not likely to be used as a weapon.

ATF  
 March 17, 2021  
 Page 3 of 5

**Design & Function**

The [REDACTED] is designed to be a receiver blank, nothing more. It is a unibody design made out of a single casting without any core strengthening inserts. Moreover, it is void of any indicators that designate or provide guidance in the completion of a firearm. The [REDACTED] lacks critical machining operations thereby requiring the end user to perform essential machining themselves. Specifically, the [REDACTED] requires significant after purchase machining, drilling, gluing, etc., all of which takes significant time prior to the completion of a firearm. See attached Exhibit A – Work Instructions.

The fundamental design purpose is to ensure the [REDACTED] is not a firearm, rather it is a receiver blank that has not crossed the threshold of being considered a firearm. The characteristics of the [REDACTED] are indicative of the fact that the [REDACTED] may not fire a projectile and may not be “readily converted” to fire a projectile. The process takes significant time and effort. As evidence that the [REDACTED] is not a GCA regulated item, please note the following characteristics:

1. Pin holes not drilled, machined, or indexed. The owner is required to drill holes to complete.

In order to build a firearm out of a [REDACTED] the owner of a [REDACTED] is required to drill holes from both sides of the receiver blank for the trigger, locking block, and fire control housing pins. See Exhibit B. This process requires the utilization of the owner’s tools, i.e. drill press, drill vice, etc. Failure to properly drill the pin holes in the [REDACTED] body will result in a non-firearm, as the [REDACTED] will be incapable of firing a projectile.

2. The barrel seat is not yet machined or formed entirely. It is incapable of accepting a locking block. The dust cover and the locking block areas have obstructions that need removal. The owner is required to remove any forward and middle obstructions.

In order to build a firearm out of a [REDACTED] the owner of a [REDACTED] is required to physically remove different obstructions in order for a barrel, locking block, and slide assembly to fit and function. See Exhibit C. This process requires the utilization of the owner’s tools, i.e. rotary tools, pliers, sandpaper, etc. Failure to remove these obstructions properly will result in a non-firearm, as the [REDACTED] will be incapable of firing a projectile.

3. The [REDACTED] is devoid of any front or rear frame rails. The owner is required to attach the included “rails” and “rail inserts” by use of an adhesive.

In order to build a firearm out of a [REDACTED] the owner of a [REDACTED] is required to adhere the frame rails and rail inserts to the [REDACTED] body by use of a provided adhesive. See Exhibit D. The adhesive must cure for at least 48 hours. Failure to properly glue the rails and rail inserts to the [REDACTED] body will result in a non-firearm, as the [REDACTED] will be incapable of firing a projectile.

ATF  
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How the [REDACTED] is sold.

The [REDACTED] is sold exclusively through independent retail distributors. [REDACTED] does not intend to sell the [REDACTED] on its website. [REDACTED] does intend to offer for sale the components necessary to complete a firearm on its website. Essentially, a potential buyer would purchase the [REDACTED] from a retailer as a non-GCA receiver blank. Subsequently, the buyer would receive within the packaging of the [REDACTED] an advertisement which advertises the [REDACTED] webstore where the potential buyer would have the option of separately purchasing the necessary components to finalize the [REDACTED] into a firearm. This sales method is by design, as the [REDACTED] will be sold completely separately from the necessary components, thereby not running afoul of ATF's position on "buy, build, shoot kits". At no time will [REDACTED] offer for sale a [REDACTED] "kit" wherein all the necessary components are present.

The [REDACTED] cannot be "readily converted" into a firearm.

The [REDACTED] does not meet the definition of "firearm" under the GCA nor the NFA. Under the NFA, it does not meet one of the eight different classifications of NFA items.<sup>1</sup> Moreover, under the GCA the [REDACTED] will not, nor is it designed to, expel a projectile by the action of an explosive. Additionally, it may not be readily converted to expel a projectile by the action of an explosive.

Neither ATF nor the GCA define "readily" as it relates to the definition of a "firearm". However, Courts have interpreted "readily" on the issue of "readily" restoring semi-automatic firearms into fully automatic firearms. There is not one consistent definition on this issue. The National Firearms Act ("NFA") defines a machine gun as "*any weapon which shoots, is designed to shoot, or can be readily restored to shoot, automatically more than one shot, without manual reloading, by a single function of the trigger.*" 26 U.S.C. § 5845(b). One similarity between the definition of a firearm and the definition of a machine gun is that both include not only items which perform in a certain way, but also those items which may be "readily" converted to perform in a certain way. The NFA does not define "readily restored" just as the GCA does not define "readily converted".

Courts have, however, defined "readily" as it relates to machine guns in a variety of ways that are relevant to ATF's analysis of the [REDACTED]. In *U.S. v. One TRW, Model M14, 7.62 Caliber Rifle*, 441 F.3d 416 (6<sup>th</sup> Cir. 2006), the Sixth Circuit stated that common dictionary definitions "make clear that 'readily' is a relative term, one that describes a process that is *fairly* or *reasonably* efficient, quick, and easy." The term "readily restored" has been recognized by Courts to entail several elements of restoration. They are as follows:

1. Time needed for restoration;

---

<sup>1</sup> (1) a shotgun having a barrel or barrels of less than 18 inches in length; (2) a weapon made from a shotgun if such weapon as modified has an overall length of less than 26 inches or a barrel or barrels of less than 18 inches in length; (3) a rifle having a barrel or barrels of less than 16 inches in length; (4) a weapon made from a rifle if such weapon as modified has an overall length of less than 26 inches or a barrel or barrels of less than 16 inches in length; (5) any other weapon, as defined in subsection (e); (6) a machinegun; (7) any silencer (as defined in section 921 of title 18, United States Code); and (8) a destructive device.

ATF  
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Page 5 of 5

2. **Ease** or difficulty with which the weapon can be restored;
3. **Expertise** (knowledge and skills),
4. **Necessary equipment**
5. **Availability**, i.e., additional parts required for the work;
6. **Expense**;
7. **Scope of the work**; and
8. **Feasibility of the work**, that is “whether the restoration would damage or destroy the weapon or cause it to malfunction.”

Additionally, courts have ruled that the term “readily” means the completion of the modifications can be completed within two minutes. *See U.S. v. Woodlan*, 527 F. 2d 608 (6<sup>th</sup> Cir. 1976).

In sum, the [REDACTED] is not a GCA nor an NFA firearm. The [REDACTED] takes significant time to complete (at a minimum 48 hours for the glue to cure alone, in addition to the other steps involving drilling, machining, etc.). It is not done with ease as it involves special skill, expertise and tools. Additionally, the parts are not readily available at a single location (including the necessary tools to complete a firearm), nor are they cheap enough to be available to everyone. Lastly, there is a chance of damaging or destroying the receiver blank during modification, given what the material it is comprised of.

### CONCLUSION

The [REDACTED] is not a GCA regulated firearm. “Receiver blanks that do not meet the definition of a “firearm” are not subject to regulation under the Gun Control Act.”<sup>2</sup> The [REDACTED] is a receiver blank that does not meet the definition of “firearm” under the law. It is, therefore, our position that the [REDACTED] receiver blank is classified as a receiver blank that is not regulated by the GCA or the NFA. [REDACTED] respectfully requests that FATD confirm that the [REDACTED] is classified as a non-firearm receiver blank that is not regulated by the GCA or the NFA.

If you have any questions, or need additional information, please contact us. We thank you in advance for your determination and look forward to hearing from you.

[REDACTED]

Sincerely,

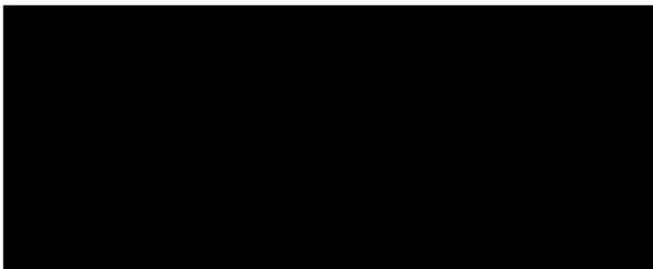
[REDACTED]

[REDACTED]

---

<sup>2</sup> See <https://www.atf.gov/firearms/qa/are-%E2%80%9C80%9C%E2%80%9D-or-%E2%80%9Cunfinished%E2%80%9D-receivers-illegal> - last accessed on February 2, 2021.

[REDACTED]



February 12, 2020

**VIA E-MAIL TO Tracey.L.Robertson@usdoj.gov**  
Bureau of Alcohol, Tobacco, Firearms and Explosives  
Federal Firearms Licensing Center  
Attn: Chief, Tracey Robertson  
244 Needy Road  
Martinsburg, WV 25405

**Re: ATF POWER OF ATTORNEY**  
**ENTITY:** 

Dear Ms. Robertson:

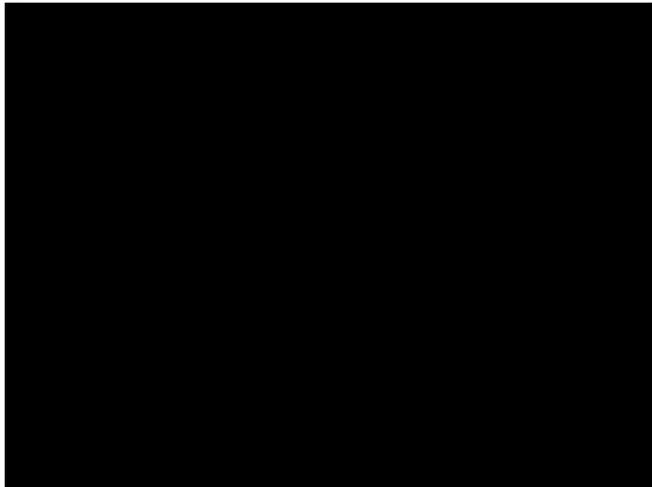
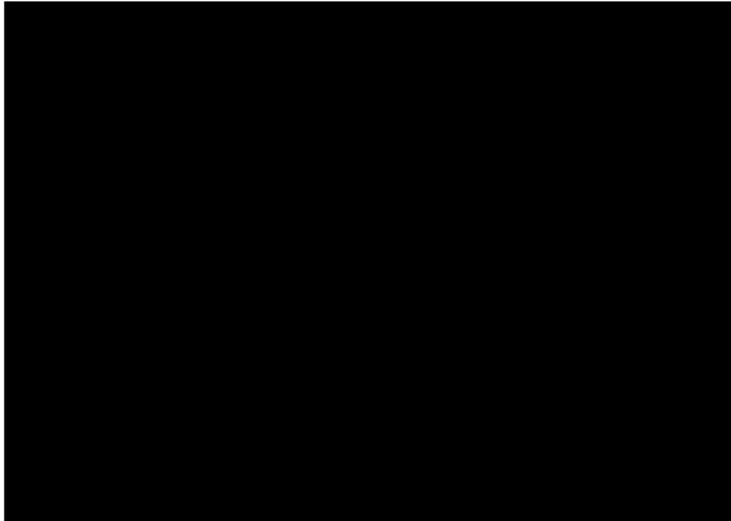
The referenced entity ("the Applicant") has engaged certain professionals to advise it with regard to its application for Federal Firearms License(s), among other ATF-related matters that may occur from time to time.

The Applicant gives this **Power of Attorney** empowering the individuals identified in the attached **Schedule A** to act and speak on the Applicant's behalf. This **Power of Attorney** includes, but is not limited to, the power to communicate with any ATF Director, Branch or Division Chief, Director of Industry Operations, Area Supervisor, Inspector, Agent, counsel, or any other official regarding any and all matters dealing with the Gun Control Act and National Firearms Act and the Applicant. The Applicant acknowledges and agrees that you may speak freely with the individuals identified on **Schedule A** as if you were dealing with the Applicant itself.



Federal Firearms Licensing Center  
February 12, 20  
Page 2 of 2

**SCHEDULE A**



# EXHIBIT A



80% Instructions

## Table of Contents

Introduction.....

Warranty .....

Bill of Materials.....

Procedures for finishing frame.....

Drill the holes (TO BE DONE FIRST).....

Locking blocking obstruction removal .....

Dust cover obstruction removal .....

Recoil rod obstruction removal .....

Front and rear rail install.....

Trouble shooting.....

**PLEASE READ INSTRUCTIONS BEFORE ATTEMPTING ANY WORK.**

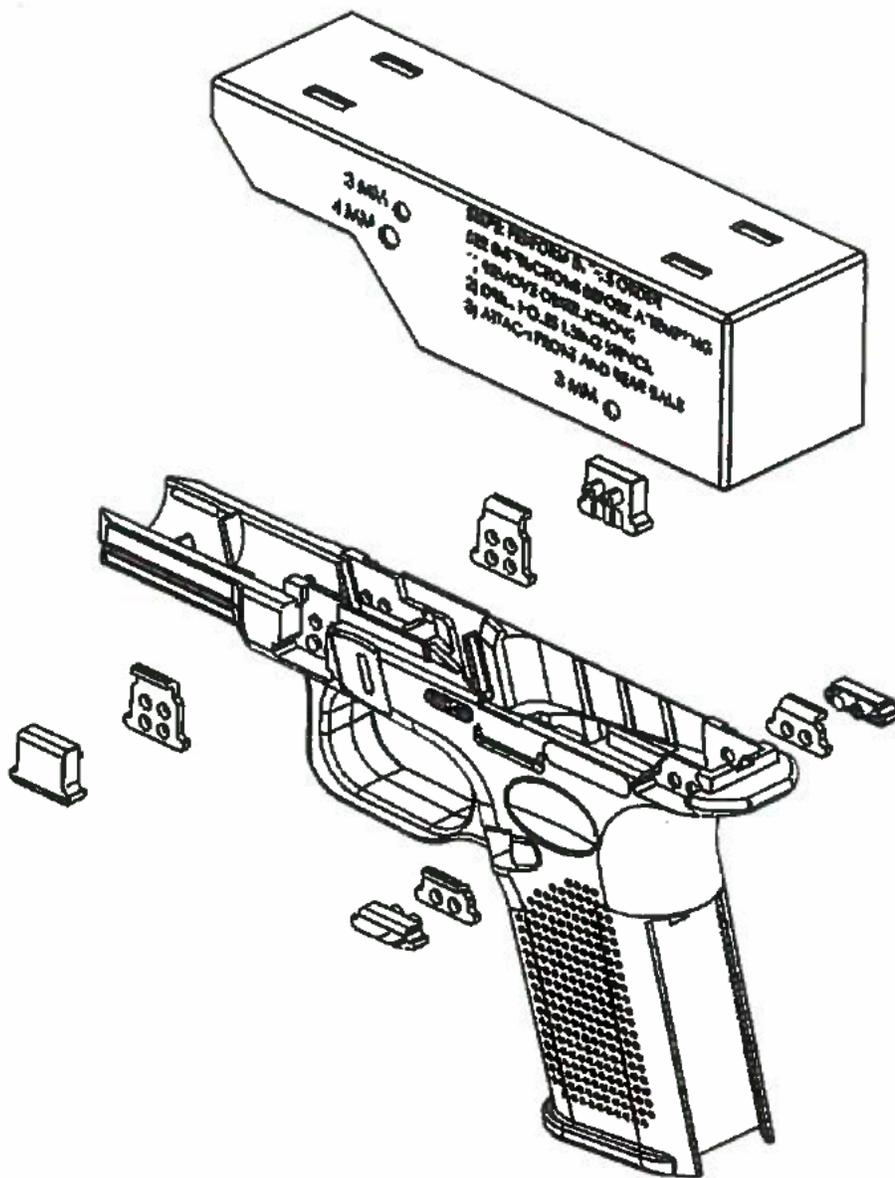


## Introduction:

Insert language about purchasing [REDACTED] product

The following content is critical for understanding the details on how to complete your new "insert final product name". The instructions within this document supersede any video or documents found elsewhere.

The instructions will be a step by step process on how to complete your new pistol. They will detail the procedures for drilling the pin holes along with the removal of the indicated impediments. As there are many methods that can produce the same result, we recommend that you follow the instructions as indicated.



## Warranty:

Insert language about what limits [REDACTED] offer.

There are limits to coverage, particularly when the customer damages the product through poor craftsmanship or improper control during the milling process, and when they drill holes using the wrong tools. Additionally, after the milling is completed, the build process seems to be where most people get into trouble, particularly during assembly and cleaning. Here are key areas that you need to watch for

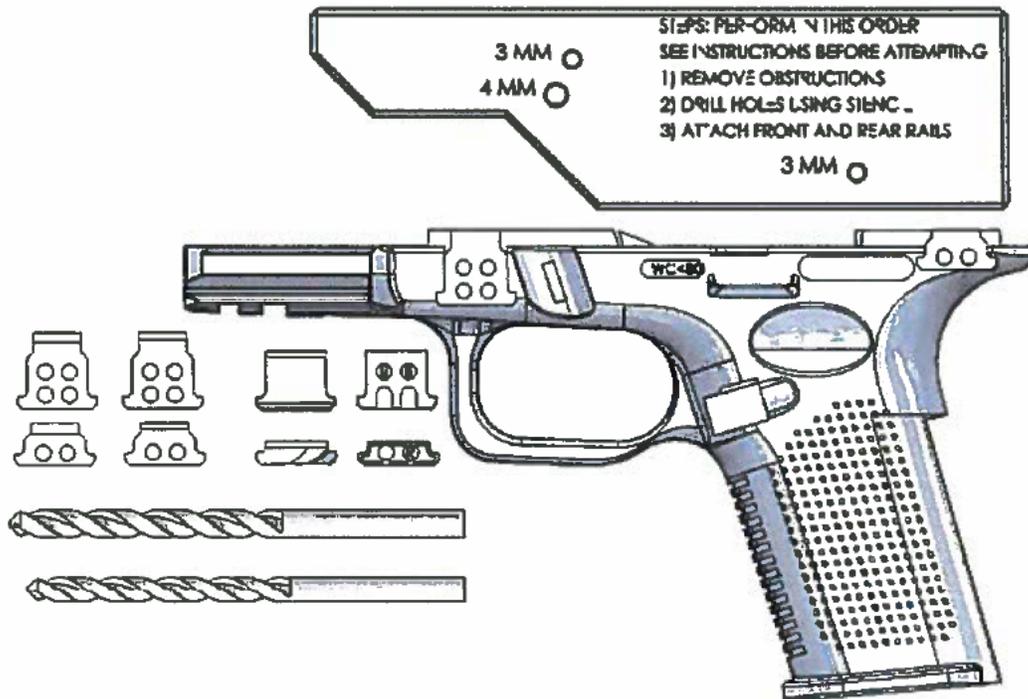
1. Drill the pin holes using the stencil provided in the [REDACTED] kit. Use a drill press and the drills provided in the kit. **DO NOT** use a hand drill either with or without a drill press vise or cross slide vise to drill your holes.
2. Only use the adhesive that is provided in the kit. This is designed for contact with polymer-based products. Super Glue versions are not to be used on the polymer.
3. Take care to know what chemicals you use on the polymer frame. **DO NOT USE ACETONE FOR ANY REASON.** Or products that contain acetone ie Break free. Use regular gun oil.

## Bill of Materials:

Below are the parts and tools that will be provided when you purchase a "insert final product name". Additional tools will be required and will be expanded upon in the next section.

PART DESCRIPTION	QUANTITY
LWC>80 % frame	1
Flat Backstrap	1
Swelled Backstrap	1
Magwell	1
Front Rail insert	2
Rear Rail insert	2
Front Rail cap	2
Rear Rail cap, Left	1
Rear Rail cap, Right	1
.1 oz Instant-Bond Adhesive Loctite® 380	1
High-Speed Steel Drill Bit 3mm Size	1
High-Speed Steel Drill Bit 4mm Size	1

ADD OTHER parts to photo



## Procedure for Finishing the Frame:

We will briefly begin with an overview of the stencil and its workings. These instructions will act as a guide as you work to complete your "insert final product name" frame. We understand that there are multiple methods and techniques that can be utilized to complete the frame. The instructions that follow are a proven technique to fulfill the operations to complete the frame. We will not expand on any other methods (i.e using a milling machine) besides what is laid out in this document.

Within the instructions the goal is to complete the following:

- 1) Drill holes (from both sides) for Trigger, Locking Block, and Fire control housing pins.
- 2) Remove forward and middle obstruction to allow for a slide assembly.
- 3) Remove rear obstruction to allow for the install of trigger and locking block.
- 4) Install front rail insert.
- 5) Install rear rail insert.

Throughout this document we will be using a variety of tools some of which will not be provided in your "insert final product name" kit. We recommend the following:

- 1) Dremel hand tool (or likeness) with a sanding drum
- 2) Pair of needle nose pliers (or likeness)
- 3) Drill press
- 4) 4-inch drill vise
- 5) Sandpaper 220 grit or higher

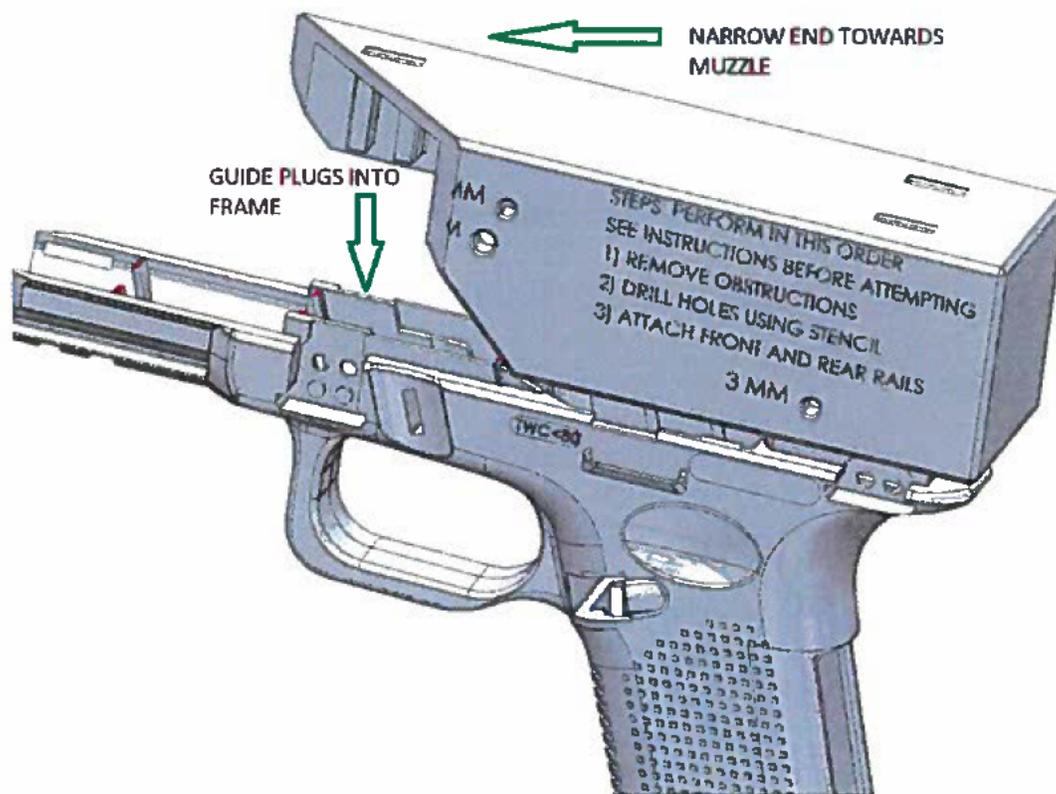
**NOTE: Some of these tools can destroy your frame if used improperly. We recommend that they be operated under an experience and steady hand.**

## Drilling the Holes: **PERFORM THIS STEP FIRST**

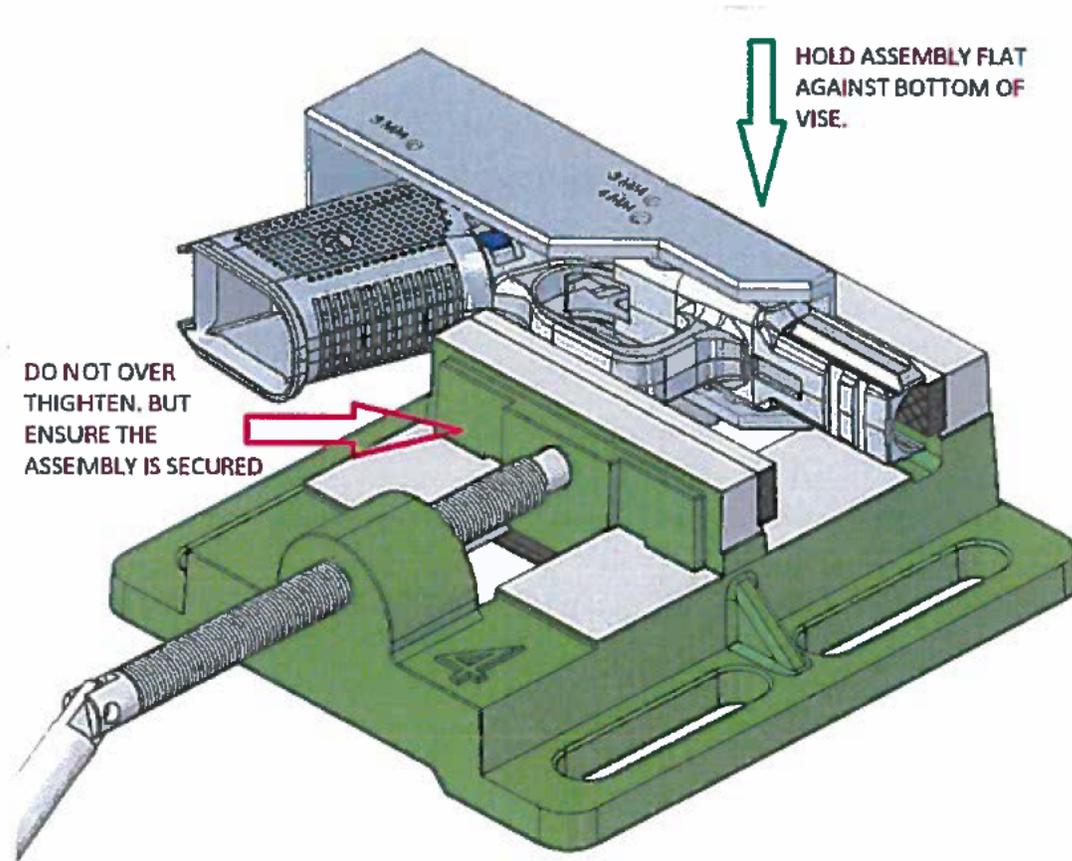
In our first operation we will be drilling holes for the trigger, locking block and Fire control housing pins. This step must be performed first. We will be drill from both sides of the frame.

Use only the stencil and drill bits provided. Do not attempt to drill holes without the stencil. Doing so will result in poor hole placement and will cause failures.

- 1) Insert the Stencil into the frame. Ensure that the narrow end is facing forward (muzzle end).

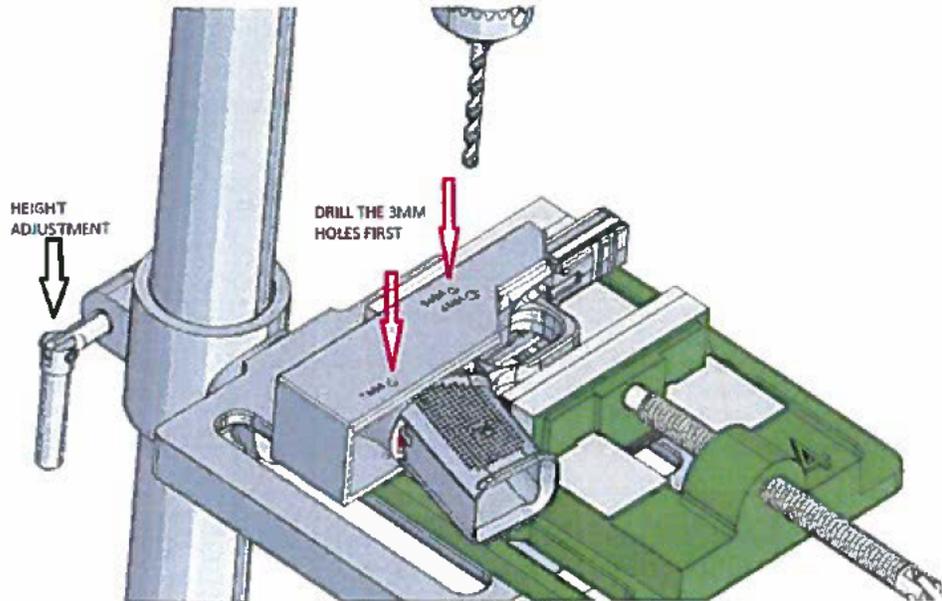


- 2) Clamp stencil and frame into a cross vise or equivalent. Hold the frame and stencil firmly against the vise as you tighten the clamp. Be sure not to over tighten as it may deflect and cause the issues with the holes.

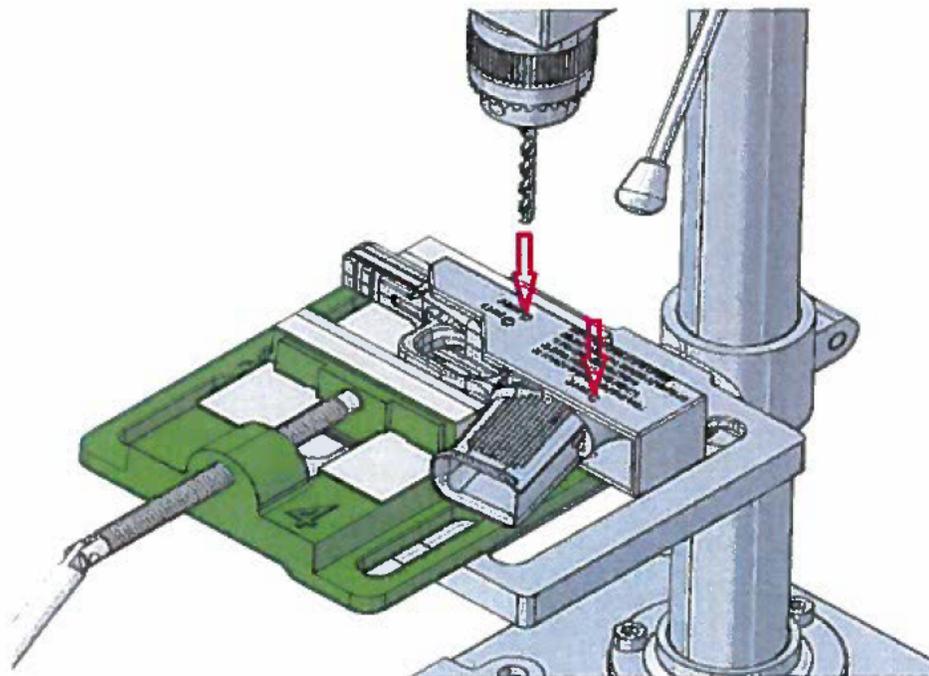


- 3) Load the 3mm drill into the drill press. Place the vise onto the drill press table and adjust the height until the end of the drill is 3" from the stencil. Keep the vise free moving to ensure the drill can self-center in the stencil. It may help to rotate the vise for the FCH pin hole to make sure you are drilling over the drill press table. **DO NOT ATTEMPT TO DRILL THROUGH THE STENCIL.**

- a. Remove the 3mm drill and replace it with the 4mm drill.



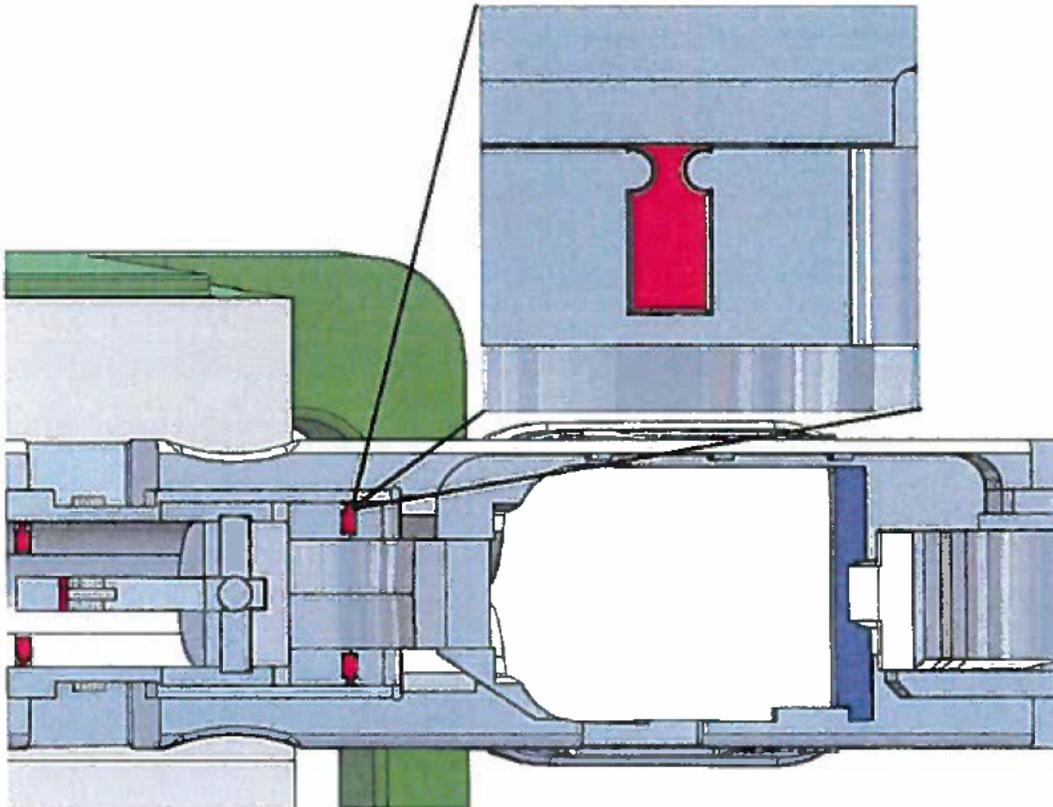
- 4) Flip the assembly and perform step 3



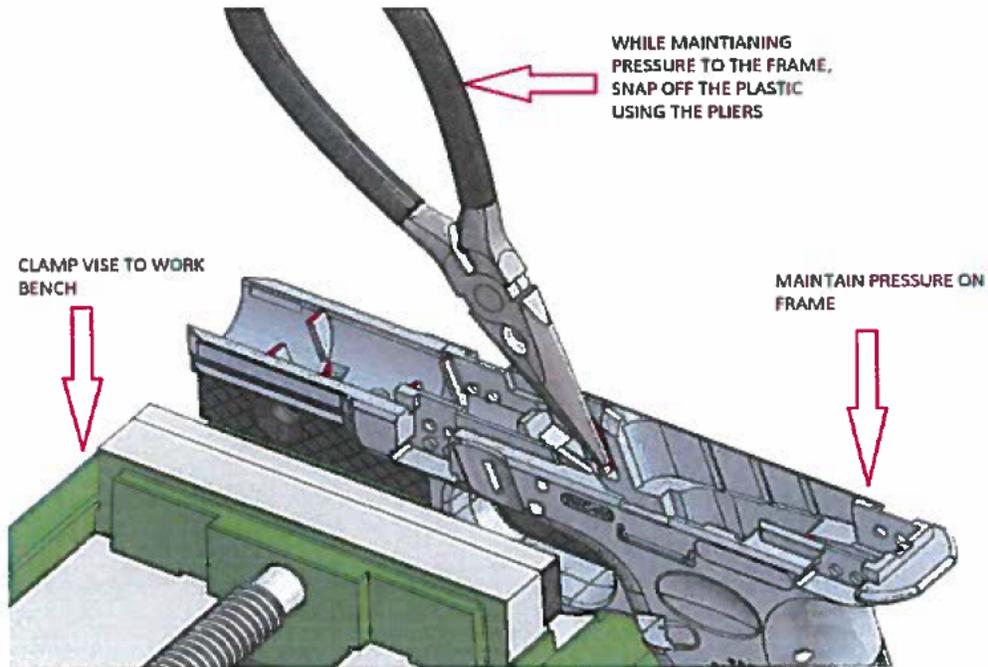
- 5) Remove the frame from the vise and the stencil. Deburr to remove any lingering polymer.

## LOCKING BLOCK OBSTRUCTION REMOVAL:

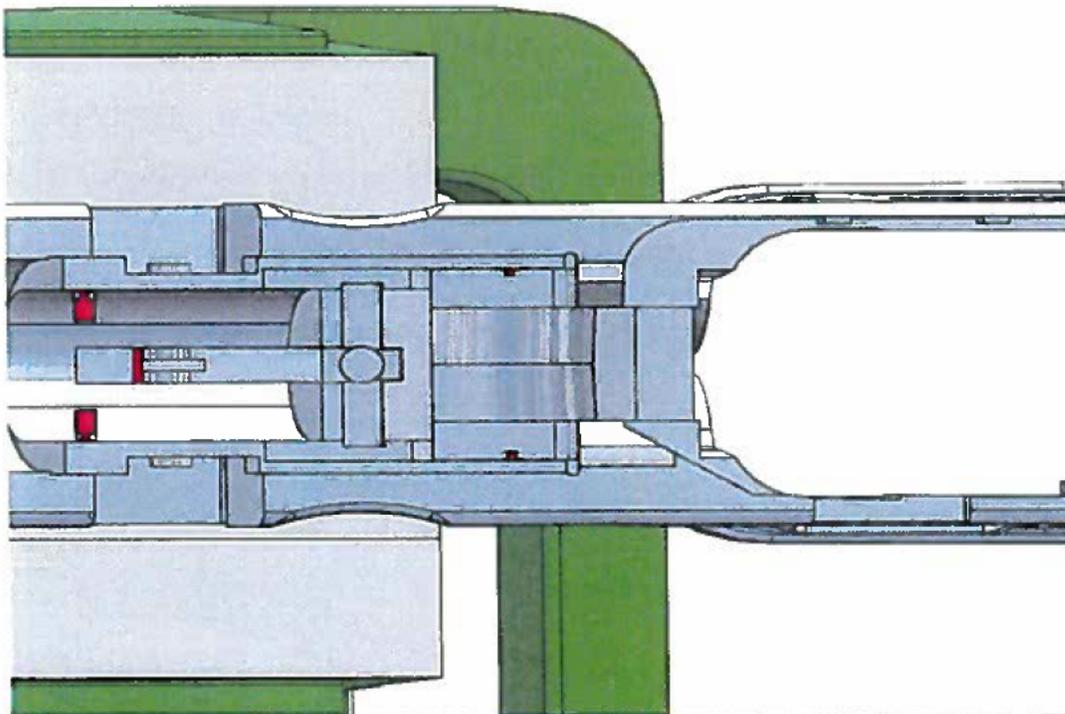
To remove the obstructions, we will need a pair of needle nose pliers, a Dremel hand tool and some sandpaper. When examining the frame, you will notice snap features (shown below). These are designed to allow the user to remove most of the obstruction with pliers. We will first use the pliers to remove the obstruction, the Dremel to clean up any residual plastic and finally some sandpaper for finishing touches.



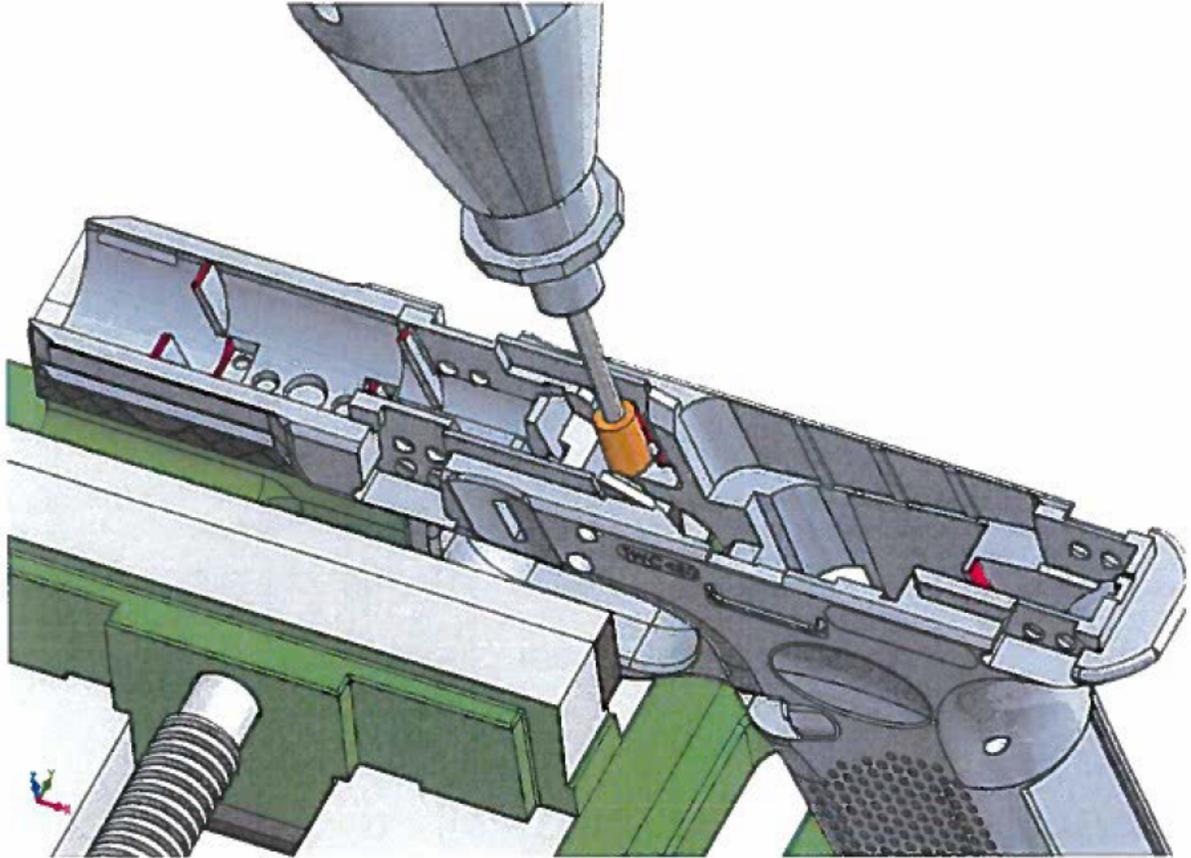
- 1) Place the frame into the vise in an upright position. Clamp to a stable work bench.
- 2) Using the pliers break away the obstructions on both sides



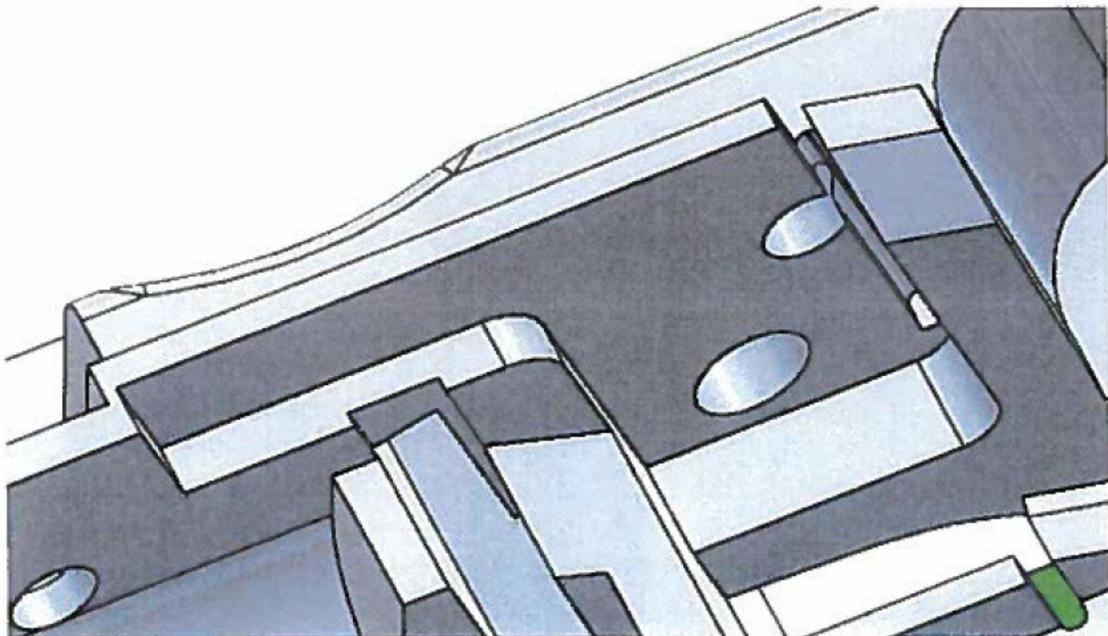
Results should be like this.



- 3) Using the Dremel and sandpaper, remove any remain plastic until a locking block will fit smoothly. This will require a steady hand. Do not be too aggressive.

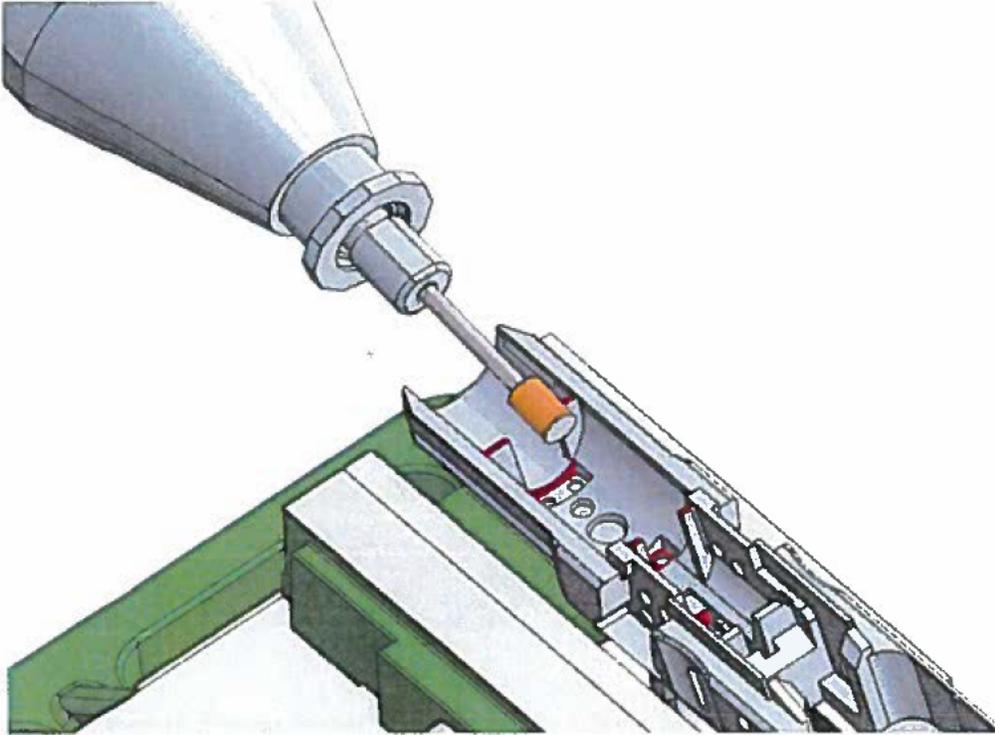


We are looking for the following result.

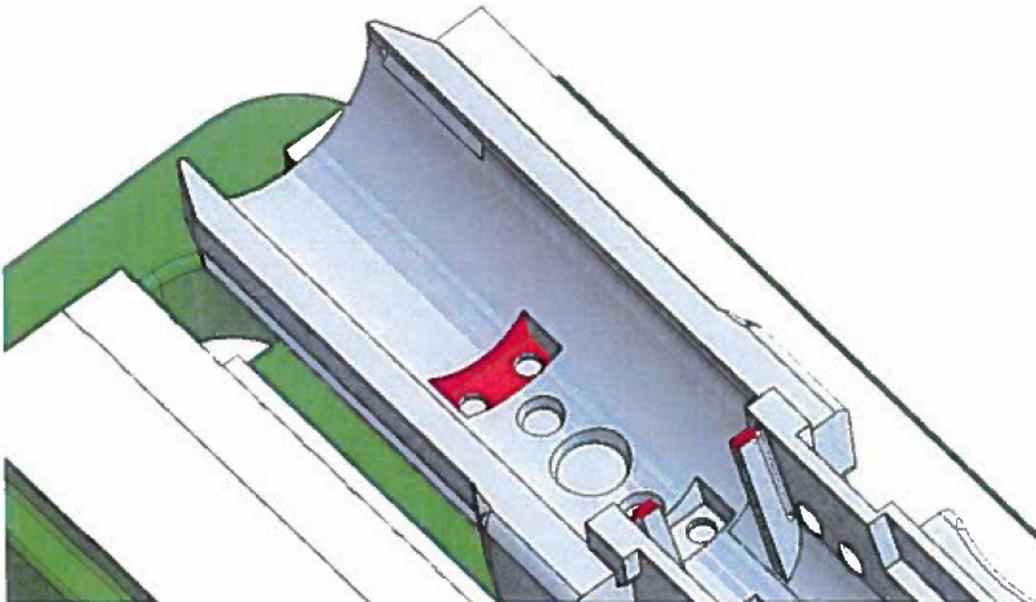


## Dust Cover Obstruction Removal:

- 1) Keep the Frame in the vise as described in previous section.
- 2) Using the Dremel remove and smooth out the dust cover obstructions.



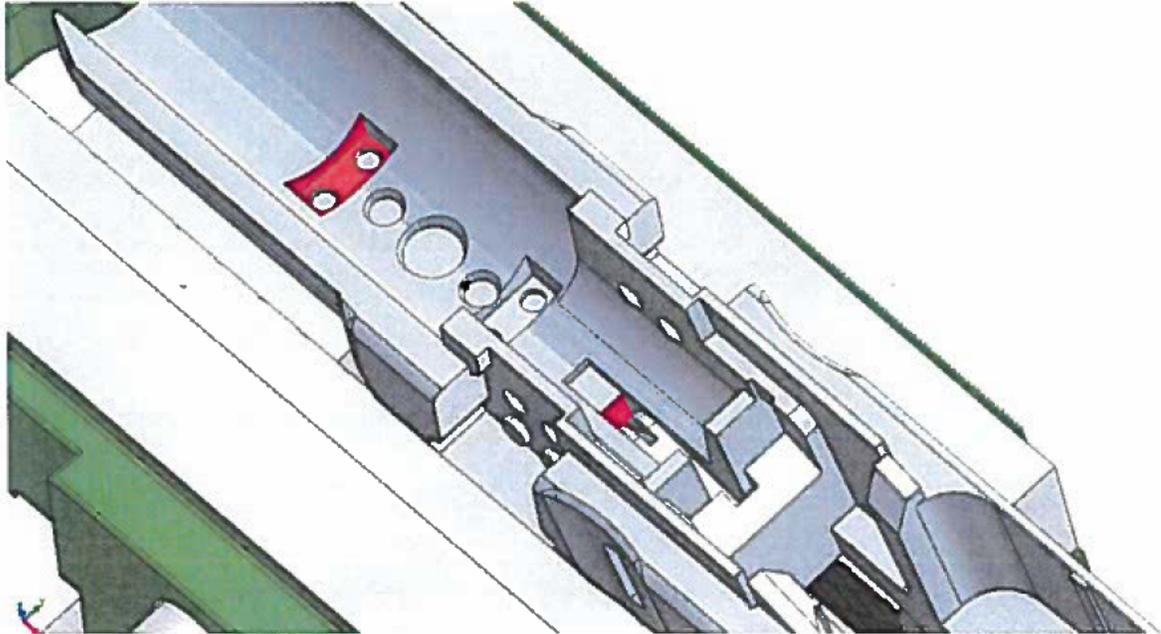
We are looking for the following result



**Recoil Rod Obstruction Removal:**

- 1) Using the same steps in the "Locking Block" remove the plastic obstructions.

We should get a result like the following

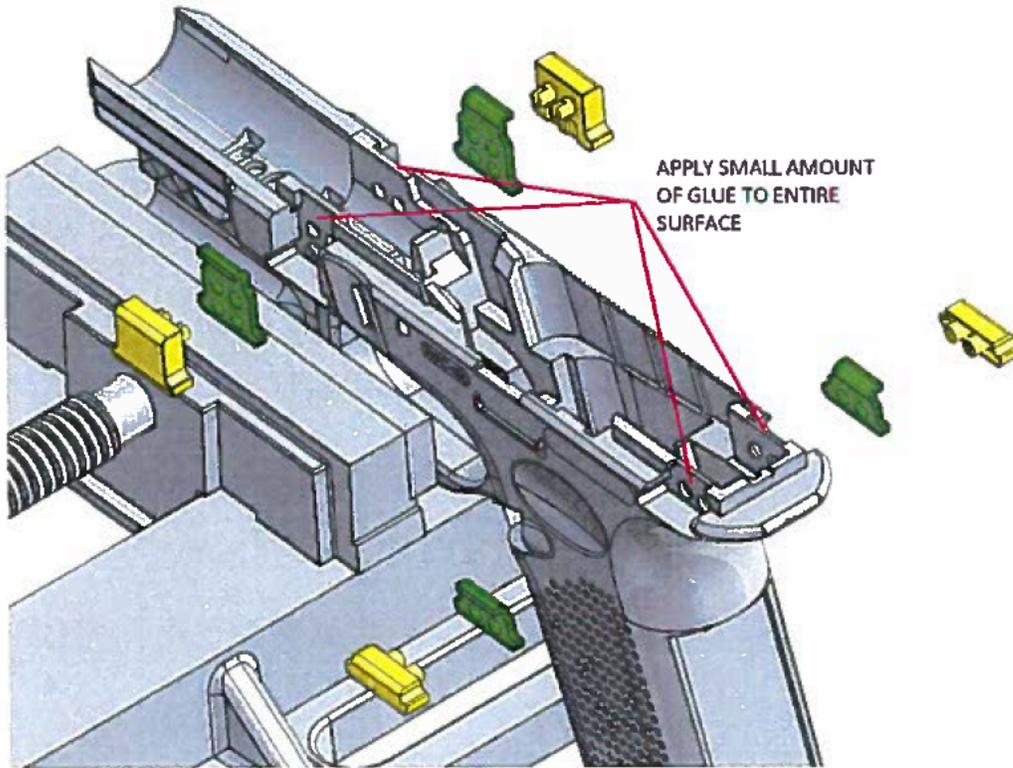


Review all the areas where obstructions were removed and ensure that there is no remain plastic, debris or burrs. Loose debris may cause issues with the next steps.

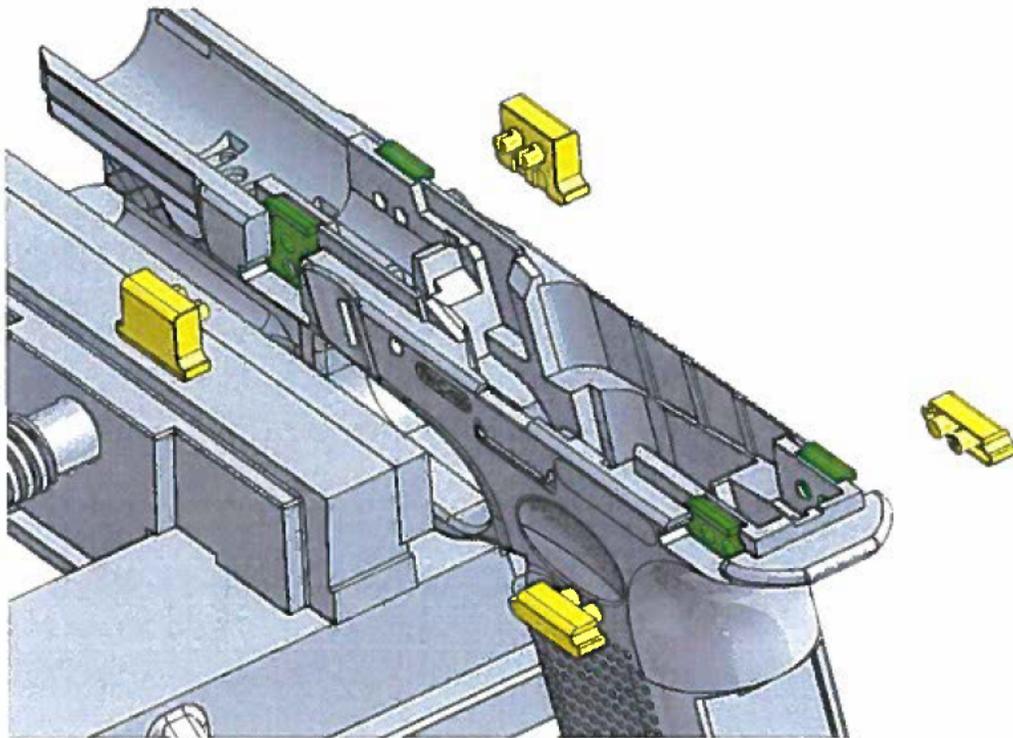
## Front and Rear Rail Install:

Once again ensure that there is no left-over debris from sanding. Leave the frame upright in the vise. Here we will be able to finalize the install of the rails.

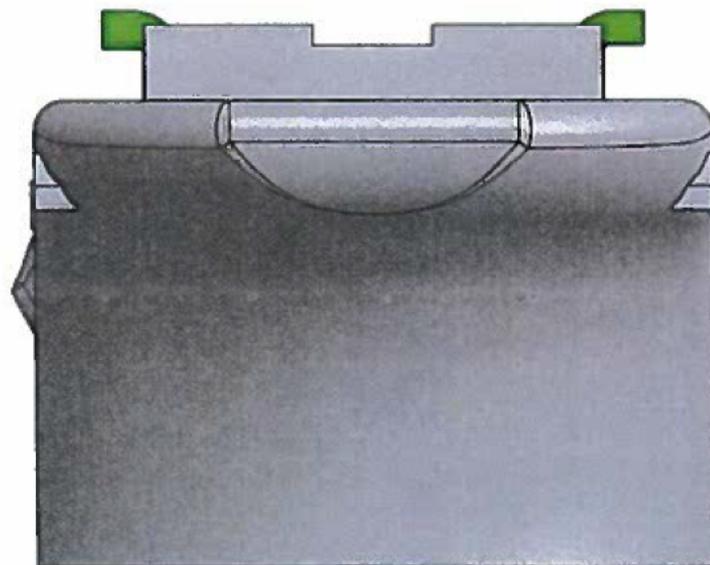
- 1) With the frame secured in the vise apply a small amount of the glue (provided in the kit) To the pockets of the frame. A small brush will help coat the entire surface.



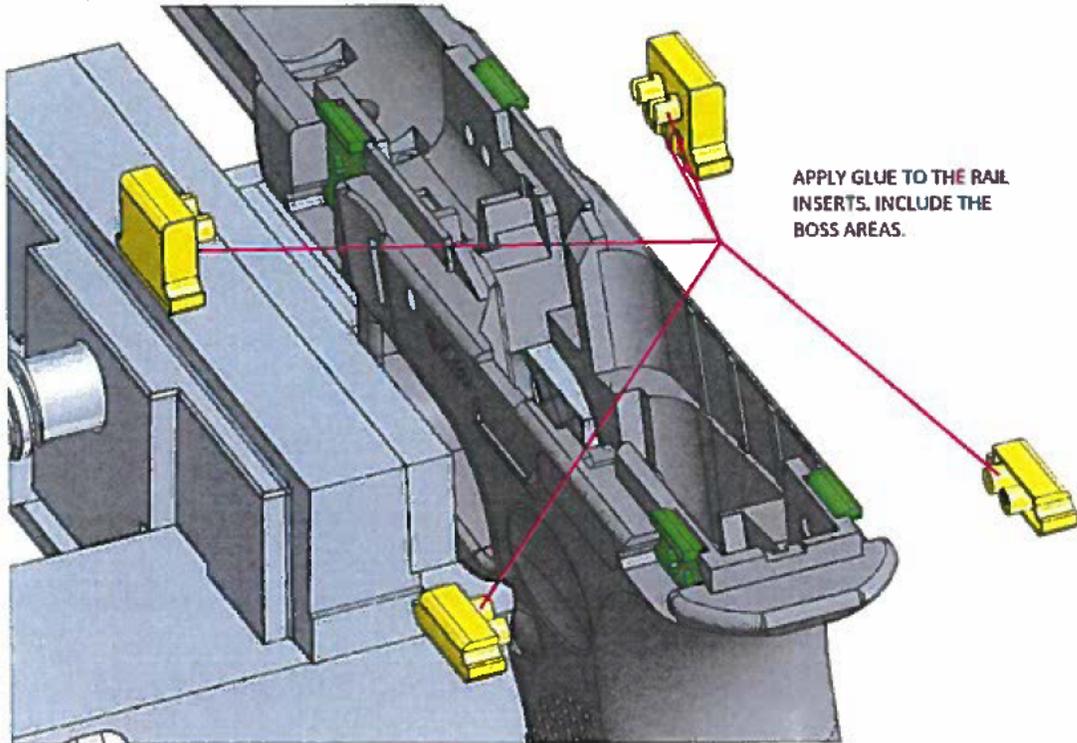
- 2) Now slide the rails into each pocket. Note that the rail should be facing away from the center of the frame.



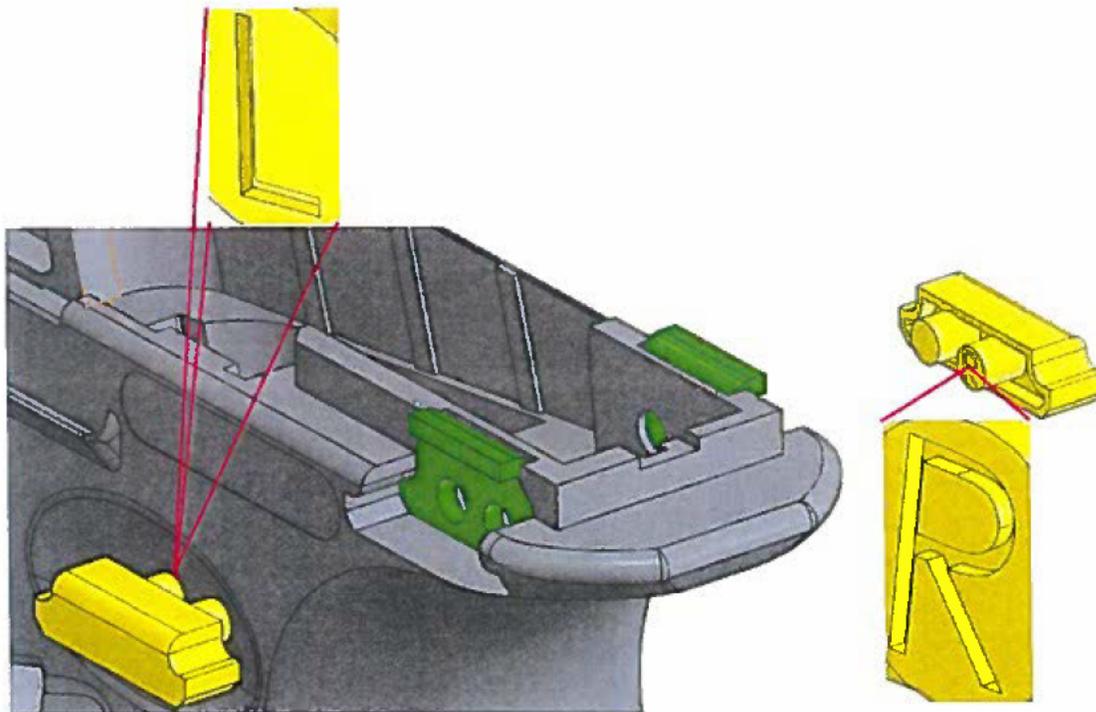
← RAILS FACING AWAY FROM CENTER OF FRAME →



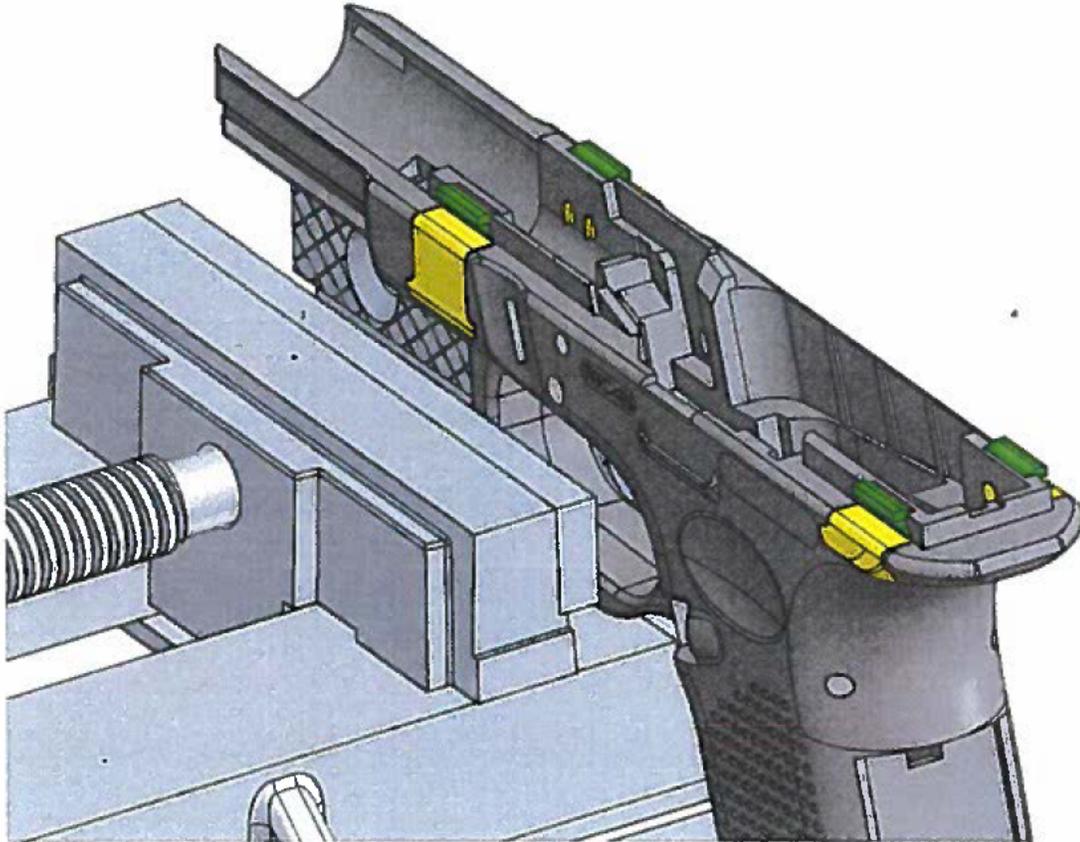
- 3) Apply glue to the faces of the rail inserts. Be sure to include a small amount on the bosses that protrude through the rail insert.



**NOTE: THERE ARE TWO SEPARATE REAR RAILS. LEFT AND RIGHT WHICH IS INDICATED ON THE BOSS.**



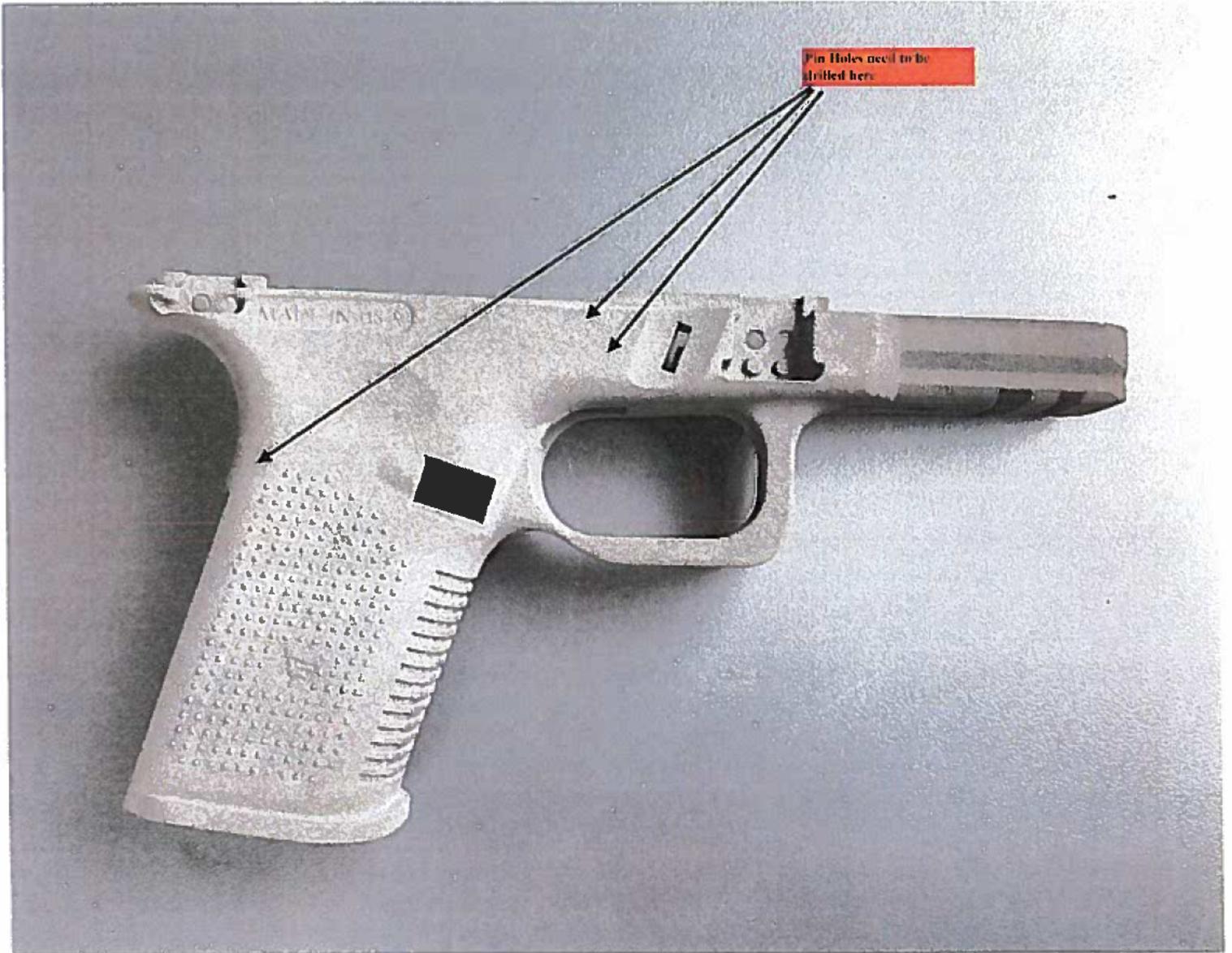
- 4) Press all four insert firmly into the frame and hold. The glue will set quickly but will need **24 HOURS TO CURE.**



**LET SIT FOR 24 HOURS BEFORE ATTEMPTING TO FIT AND  
FUNCTION THE FRAME.**

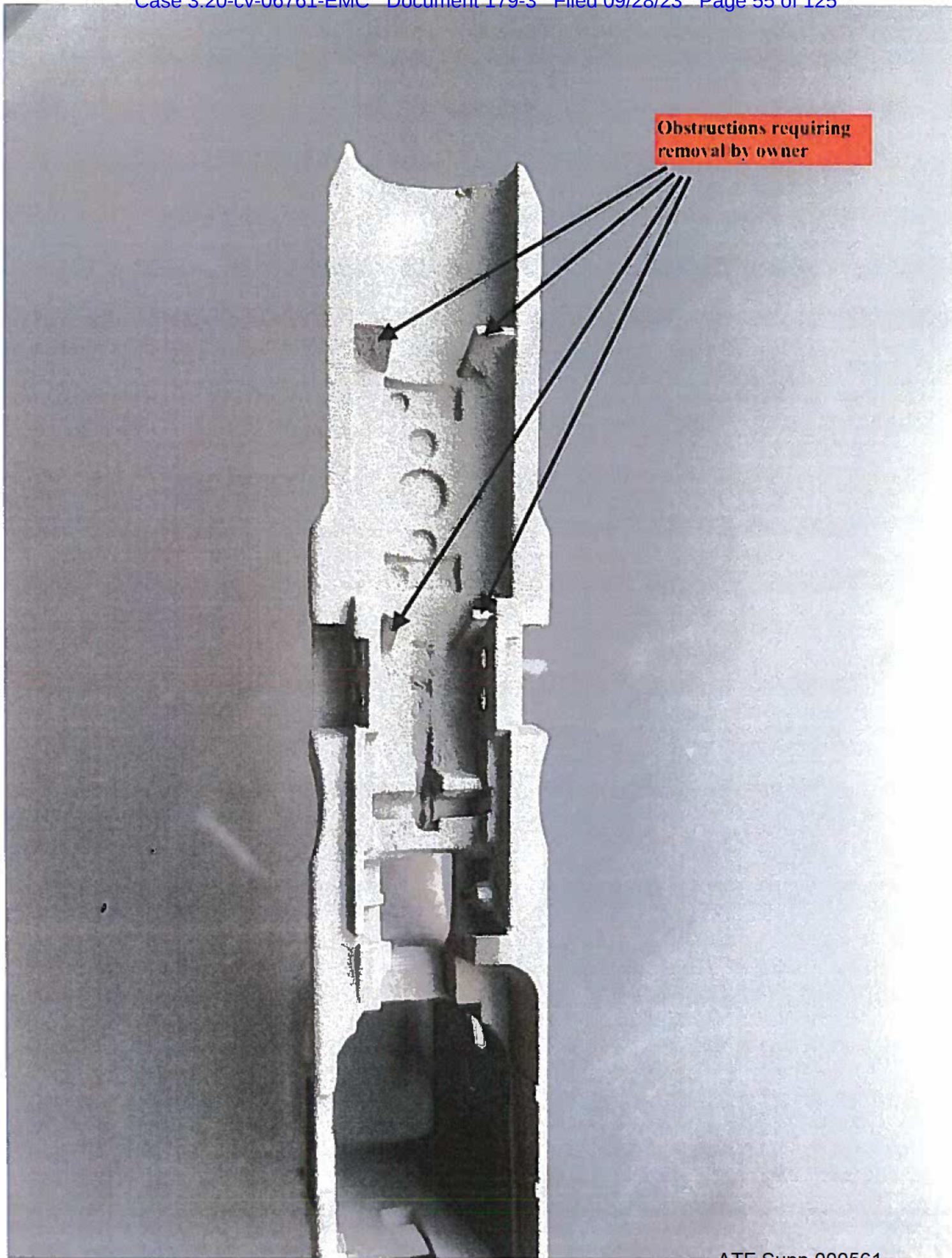
FOR QUESTIONS OR CONCERNS PLEASE CONTACT [REDACTED] AT "INSERT NUMBER" OR VISIT "INSERT  
WEB ADDRESS FOR ONLINE HELP"

# EXHIBIT B



# EXHIBIT C





**Obstructions requiring  
removal by owner**

# EXHIBIT D











March 15, 2021

Branch Chief  
B.A.T.F.  
Firearms Technical Branch  
244 Needy Road  
Martinsburg, WV 25405

*EVAL.  
316-304*

**RECEIVED**  
MAR 18 2021  
BY: *FA70*

Dear Sir / Madam:

*ONE  
Receiver  
Blank*

*I am submitting a prototype of a receiver blank for determination as to whether it is a firearm or not. This blank is for the [redacted] pistol. At the counsel of an expert, we have taken several steps to ensure it is not a firearm, as well as ensured the pathway to completion as a firearm will be a legal semi-automatic pistol, taking significant additional effort to do otherwise.*

*Steps to completion:*

- 1. Machine fire control group holes, including making a keyway for the selector hole.
- 2. Machine a window in the bottom for the trigger.
- 3. Machine the front takedown pin hole.

*Steps we have taken to ensure the pathway of completion is one towards a legal semi-automatic pistol:*

- 1. A denial shelf has been added to the right-hand side of the fire control group pocket, preventing the installation of the auto sear without significant material removal.
- 2. The through-hole on the bottom of the receiver that functions as both a detent for the retainer plate and an auto sear spring has been changed to a blind hole.
- 3. The holes for the rate reducer mechanism have been omitted.
- 4. The stock dovetail has been omitted.

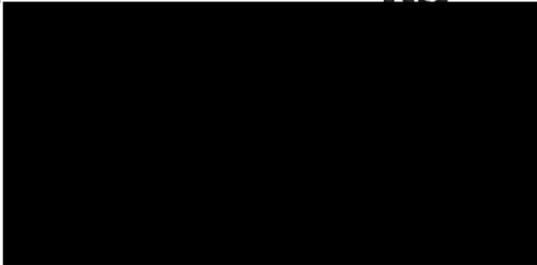
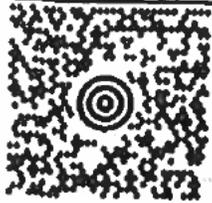
*The above steps are the same as on the already imported and common [redacted] pistols, with the additional step of adding the auto sear denial shelf.*

*I have enclosed my company's FFL and a return shipping label.*

Thank you for your time and consideration,



*P.S. I apologize for the poor print quality.  
ATF Supp 000567  
The sentences appearing *Italicized* was not intended.*

FIREARMS & AMMUNITION TECHNOLO BUREAU OF ALCOHOL, TOBACCO, FI 244 NEEDY ROAD MARTINSBURG WV 25405		2 LBS <b>RS</b>	1 OF 1 DWT: 10,8,4
			
	<b>NC 283 0-01</b> 		
<b>UPS 2ND DAY AIR</b>		<b>2</b>	
TRACKING #: 1Z 0WX 449 87 2425 0834			
			
BILLING: P/P DESC: Goods or Documents RETURN SERVICE			
XOL 21.02.07		NV45 42.0A 01/2021*	
			

**RECEIVED**  
MAR 18 2021  
BY: FA7D



2 LBS

DWT: 10,84

BUREAU OF ALCOHOL, TOBACCO & FIREARMS  
244 NEEDY RD  
STE 1800  
MARTINSBURG WV 25405

P: ORANGE S: LEFT  
**WOOD - MFL**  
1Z0WX449021592 2847  
R09R099BUC MAR 18 2021

SHIP TO:  
FIREARMS & AMMUNITION TECHNOLOGY DIVISION  
BUREAU OF ALCOHOL, TOBACCO, FIREARMS  
244 NEEDY RD  
MARTINSBURG WV 25405-9431



**MD 217 9-10**



**UPS 2ND DAY AIR**

TRACKING #: 1Z 0WX 449 02 1592 2847

**2**



BILLING: P/P

XOL 21.02.07 NV45 42.0A 01/2021\*



# EVAL 316 – 492

**RECEIVED**  
APR 12 2021  
BY: **FATO**.....



EVAL. 316-492

Snyder, Guy J.

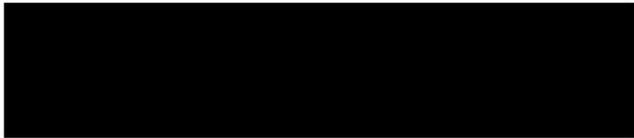
From: [REDACTED]  
Sent: Monday, April 12, 2021 3:59 PM  
To: Snyder, Guy J.  
Subject: [REDACTED]

Greetings,

Enclosed is a sample of an incomplete receiver intended for application on an AR-15 type rifle.

This sample is submitted for determination that it is not a functional firearm, and that it satisfies all legal requirements outlined by law. It has been created only with required and desired external features but none that should make it immediately operational as a firearm component. We await your determination and are ready and willing to make any modification or change to the design to fulfill and satisfy your requests.

Please contact us with any inquiry,



RECEIVED  
APR 12 2021  
BY: FATO

ONE  
AR-15  
Lower  
Receiver

FROM: (877) 283-3352  
Firearms & Ammo Tech Division  
BATFE  
244 Needy Road  
MARTINSBURG WV 25405  
US

CAD 250713486/INET4340  
DIMMED 8 X 8 X 4 IN

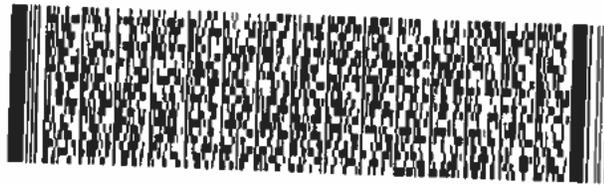


(US) 560J26EP2JEA/A

PO

DEPT

RMA:



FedEx  
Ground



2112103101w

TRK# 7733 5808 7364

RETURN

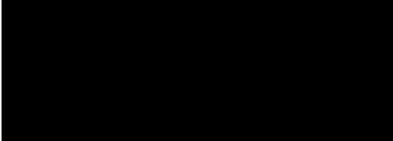
84790

9632 0137 6 (000 000 0000) 0 00 7733 5808 7364



EVAL.  
326-492

**RECEIVED**  
APR 12 2021  
BY: KATD



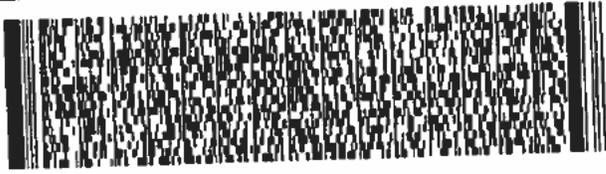
SHIP DATE 05APR21  
ACTWGT 1.50 LB  
CAD 250713486ANET4340  
DIMMED 8 X 8 X 4 IN  
BILL SENDER

TO Firearms & Ammo Tech Division  
BATFE  
244 Needy Road

MARTINSBURG WV 25405  
(877) 283-3352

(US) 560125EF2JFENA

INV PO DEPT



FedEx Ground



211321003101uv

ONE  
AR-15  
Lower  
Receiver

4/12/2021  
@ 3:40 PM  
CUSTOMER  
WILL PROVIDE  
PAPER WORK

TRK# 7733 5808 6931

25405

9632 0019 6 (000 000 0000) 0 00 7733 5808 6931



EVAL. 316-778



5.17.2021

RECEIVED  
MAY 24 2021  
BY: *FAD*

THREE  
AR-15  
Receivers

To whom it may concern,

I am writing and submitting 3 versions of our lower receiver as an 80% unit for production. Please inform as to whether all three suffice as an 80% classification. Thank you for your time.

Regards,



3 LBS

**RECEIVED**

MAY 24 2021

BY: *FA70*

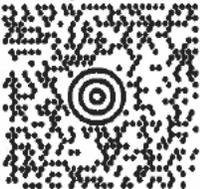
1 OF 1

SHIP TO:

FTISB  
 BUREAU OF ATF  
 SUITE 1600  
 244 NEEDY ROAD  
 MARTINSBURG WV 25405

*5/24/2021*

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**MD 217 9-10**



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**UPS GROUND**

TRACKING #: 1Z 923 3XY 03 4096 3981

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BILLING: P/P

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[REDACTED]

[REDACTED]

EVAL  
317-036

RECEIVED  
JUN 28 2021  
FATD  
BY: .....

June 23, 2021

**Bureau of Alcohol, Tobacco, Firearms, and Explosives**

Firearms & Ammunition Technology Division

Attn: FTISB

244 Needy Road Suite 1600

Martinsburg, WV 25405

ONE  
AR-15  
Receiver

**Subj: Request Receiver Determination**

Sir,

Please find a prototype partially finished AR pattern lower included. We would like a receiver determination as to whether the FTISB would consider the included components to be a firearm.

Additionally, if the fire control recess, hammer pin, trigger pin, and selector pin holes were machined, which part would be considered the receiver?

Email correspondence is included for clarity, and if there are further questions I can be reached at [REDACTED] or [REDACTED]

Thank you.

[REDACTED]

**From:** Fire Tech  
**Sent:** Monday, May 17, 2021 2:55 PM  
**To:** [REDACTED]  
**Subject:** RE: Partially Machined AR Pattern Lower Receiver

RECEIVED  
JUN 28 2021  
BY: FATD

Dear [REDACTED]

In some cases we can make this type of (AR receiver) determination from a 3D printed prototype. Please include in your supporting information any specific questions that you have in relation to your request. Such as; that you are requesting a receiver determination on the submitted sample, and that the sample is a prototype (include information advising exactly what material will be used to manufacture the receivers.)

To help in preparation - note where we have indicated on [www.atf.gov](http://www.atf.gov) that FTISB has previously determined that an AR-type receiver which has no machining of any kind performed in the area of the trigger/hammer (fire control) recess might not be classified as a firearm. Such a receiver could have all other machining operations performed, including pivot-pin and takedown-pin hole(s) and clearance for the takedown-pin lug that does not exceed .800 inches (measured from immediately forward of the front of the buffer retainer hole) but must be completely solid and un-machined in the fire-control recess area. Also, hammer pin, trigger pin, and selector holes should not be machined to any degree and should not be indexed or marked for machining.

Thank you,

FATD-FTISB

**From:** [REDACTED]  
**Sent:** Monday, May 17, 2021 2:25 PM  
**To:** Fire Tech <[Fire\\_tech@atf.gov](mailto:Fire_tech@atf.gov)>  
**Subject:** RE: Partially Machined AR Pattern Lower Receiver

Thanks for the quick reply. Would a 3D printed full scale sample work? The actual item would be made from aluminum. I'm trying not to machine parts any further than necessary without guidance.

Thanks.

**From:** Fire Tech  
**Sent:** Monday, May 17, 2021 2:11 PM

**Subject:** RE: Partially Machined AR Pattern Lower Receiver

Please be aware the Firearms and Ammunition Technology Division does not classify firearms based on drawings, photographs, written descriptions, or diagrams. In order to render an appropriate classification, a physical sample must be submitted to the Firearms and Ammunition Technology Division for evaluation. If you would like to send the subject sample item and any supporting information and questions, please ship it to our address:

Bureau of Alcohol, Tobacco, Firearms, and Explosives  
Firearms & Ammunition Technology Division

**Attn: FTISB**

244 Needy Road Suite 1600

Martinsburg, WV 25405

It should be noted that correspondence from our Division is dependent upon, and unique to, the particular facts, designs, characteristics, exact configurations or scenarios presented in an individual submission. Although other firearms may appear to present similar issues, because of wide variation in design and the legal significance of any particular design feature, FTISB classifications only pertain to the particular item submitted and evaluated. The variety of submissions, applicable statutes, and judicial interpretation of these statutes, the individual submitter's intent, and the objective design features supporting that intent are examples of variables that make generally applicability of a particular classification exceedingly rare.

The Firearms Technology Industry Services Branch (FTISB) classifies firearms as defined by the Gun Control Act (GCA) and National Firearms Act (NFA). These statutes generally regulate "firearms" and not individual components. However, the use of a component may be relevant in showing the submitter's intent to bring the firearm under a particular statutory definition. Therefore, any requests for a determination on how an accessory affects the classification of a firearm under the GCA or NFA must include a functioning firearm with the accessory already installed.

You must include a pre-paid label for the return of the item. If shipping any firearms, we advise you ship them via FedEx or another similar carrier. Also, we

cannot guarantee that the item(s) will not be damaged or destroyed during the evaluation process.

---

**From:** [REDACTED]  
**Sent:** Monday, May 17, 2021 2:06 PM  
**To:** Fire Tech <[Fire\\_tech@atf.gov](mailto:Fire_tech@atf.gov)>  
**Subject:** Partially Machined AR Pattern Lower Receiver

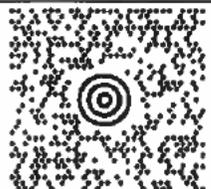
Good Afternoon,

Would the ATF consider any of the attached pictures to be firearms? The fire control cavity is left solid on the left and right halves, so to my understanding based off the ATF website this would mean none of the three parts would meet the requirements to be a receiver, but I'd like to be sure.

This is the ATF page I'm referencing: <https://www.atf.gov/firearms/qa/are-%E2%80%9C80%E2%80%9D-or-%E2%80%9Cunfinished%E2%80%9D-receivers-illegal>

Thanks.

[REDACTED]

ATTN: FTISB 9105959072 BATFE 244 NEEDY RD STE 1600 MARTINSBURG WV 25405-9431	<b>2 LBS</b> <b>RS</b> DWT: 12,6,2	<b>1 OF 1</b> Part # 15698-435 RFD8 EXP 04/19
	<b>NC 285 1-01</b> 	
<b>UPS GROUND</b> TRACKING #: 1Z 179 Y10 90 9946 6649		
		
BILLING: P/P DESC: RMA# 873485221 RETURN SERVICE		
<small>KOL21 09 28 14 12 23 04 09 2021</small>		 <small>TM</small>

**2 LBS** **1 OF 1**  
DWT: 12.6,2  
Part # 150598-435 RNOB EXP 04/19

**SHIP TO:**  
ATTN: FTISB  
BATFE  
FIREARMS & AMMUNITION TECH DIV  
244 NEEDY RD STE 1600  
MARTINSBURG WV 25405-9431

 **MD 217 9-10**  


**UPS GROUND**  
TRACKING #: 1Z 179 Y10 03 9692 1235



BILLING: P/P



ADL21 US 06 JUN 10 20 04 05 2021

**RECEIVED**  
JUN 28 2021  
BY: *FATD*

**TO:**  

---

**FATD**

January 7, 2021

EVAL.  
315-876

RECEIVED  
JAN 20 2021  
FATO  
BY:.....

ATF – Technical dept

Dear Sir,

We would like for you to evaluate these 5 80% receivers, AR-15, AR-10, AR9, AR15 Single Shot and a 1911 to determine if they are classified as a legal firearm or an 80% receiver. I kindly ask for a individual letter with photos for each receiver. I also attached a letter I received from you back in 2013 if needed for reference. Enclosed is a prepaid shipping label to return the samples.

Thank you very much.

[Redacted address block]

~~BAH~~

ONE  
RTN Label  
Retained  
w/EVAL. 315-876

Receivers:

- AR-9 - <sup>EVAL.</sup> 315-876-0A\$
  - AR-10 - <sup>EVAL.</sup> 317-414
  - AR-15 - <sup>EVAL.</sup> 317-416
  - AR-15 \$ \$ <sup>EVAL.</sup> 317-418
  - 1911 - <sup>EVAL.</sup> 317-420
- TOTAL: 5



U.S. Department of Justice

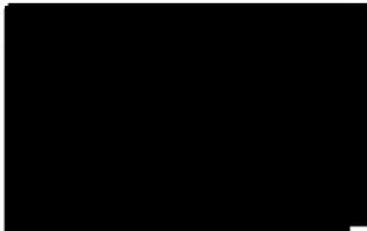
Bureau of Alcohol, Tobacco,  
Firearms and Explosives

Martinsburg, WV 25403

www.atf.gov

903050:MCP  
3311/301066

July 16, 2013



**RECEIVED**  
JAN 20 2021  
FATP  
BY: .....

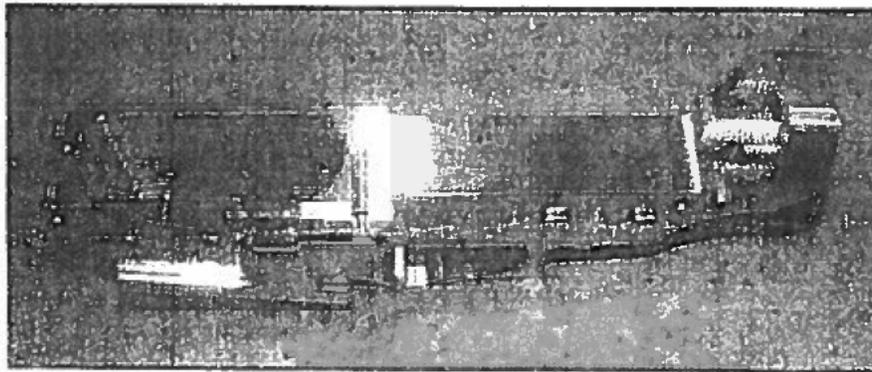
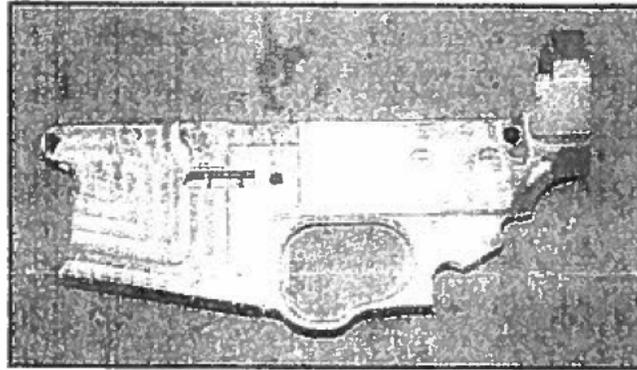
This is in reference to your correspondence to the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), Firearms Technology Branch (FTB), which accompanied your prototype sample of a partially-finished AR-15 type receiver your company intends to manufacture and market. Specifically, you requested an examination and classification of the submitted sample pursuant to the amended Gun Control Act of 1968 (GCA) and asked if this sample would be regulated as a "firearm" under the GCA.

As background, the GCA, 18 U.S.C. § 921(a)(3), defines the term "firearm" to include *any weapon (including a starter gun) which will or is designed to or may be readily converted to expel a projectile by the action of an explosive...[and] ...the frame or receiver of any such weapon....*

Based on this definition, a firearm receiver casting or firearm receiver blank can itself be a "firearm" if completed to the point at which it can be recognized as a firearm frame or receiver.

As you may be aware, FTB has previously determined that an AR-15 type receiver which has no machining of any kind performed in the area of the trigger hammer (fire-control) recess might not be classified as a firearm. Such a receiver could have all other machining operations performed, including pivot-pin and takedown-pin hole(s) and clearance for the takedown-pin lug, but must be completely solid and un-machined in the fire-control recess area.

Our examination confirmed that the submitted sample has been partially machined, including pivot-pin and takedown pin hole(s). The item incorporates a selector detent hole, but it is completely solid and un-machined in the fire-control recess area (see photos below).



Submitted prototype sample

Accordingly, FTB finds that your prototype is not a "firearm" as defined in the GCA. We caution that this finding is based on the sample as submitted. If the design, dimensions, configuration, method of operation, or materials used were changed, our determination would be subject to review.

To facilitate return of the submitted item, please provide FTB with an appropriate FedEx or similar account number within 60 days of receipt of this letter.



We thank you for your inquiry and trust that the foregoing has been responsive to your request.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Earl Smith".

Earl Smith  
Chief, Firearms Technology Branch

<b>P</b>	<b>US POSTAGE AND FEES PAID</b>	<b>easypost</b>
	2021 01 07	
	25405	
	C69245	
	ComPisPrice	
FLAT RATE MED BOX	0901000002348	

**USPS PRIORITY MAIL**

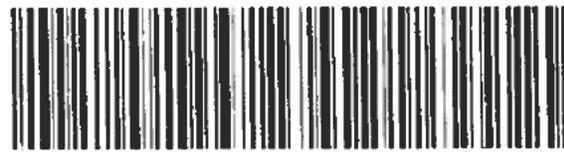
FIREARMS & AMMUNITION TECHNOLOGY  
MIKE WINTERS  
244 NEEDY ROAD  
MARTINSBURG WV 25405

**0004**

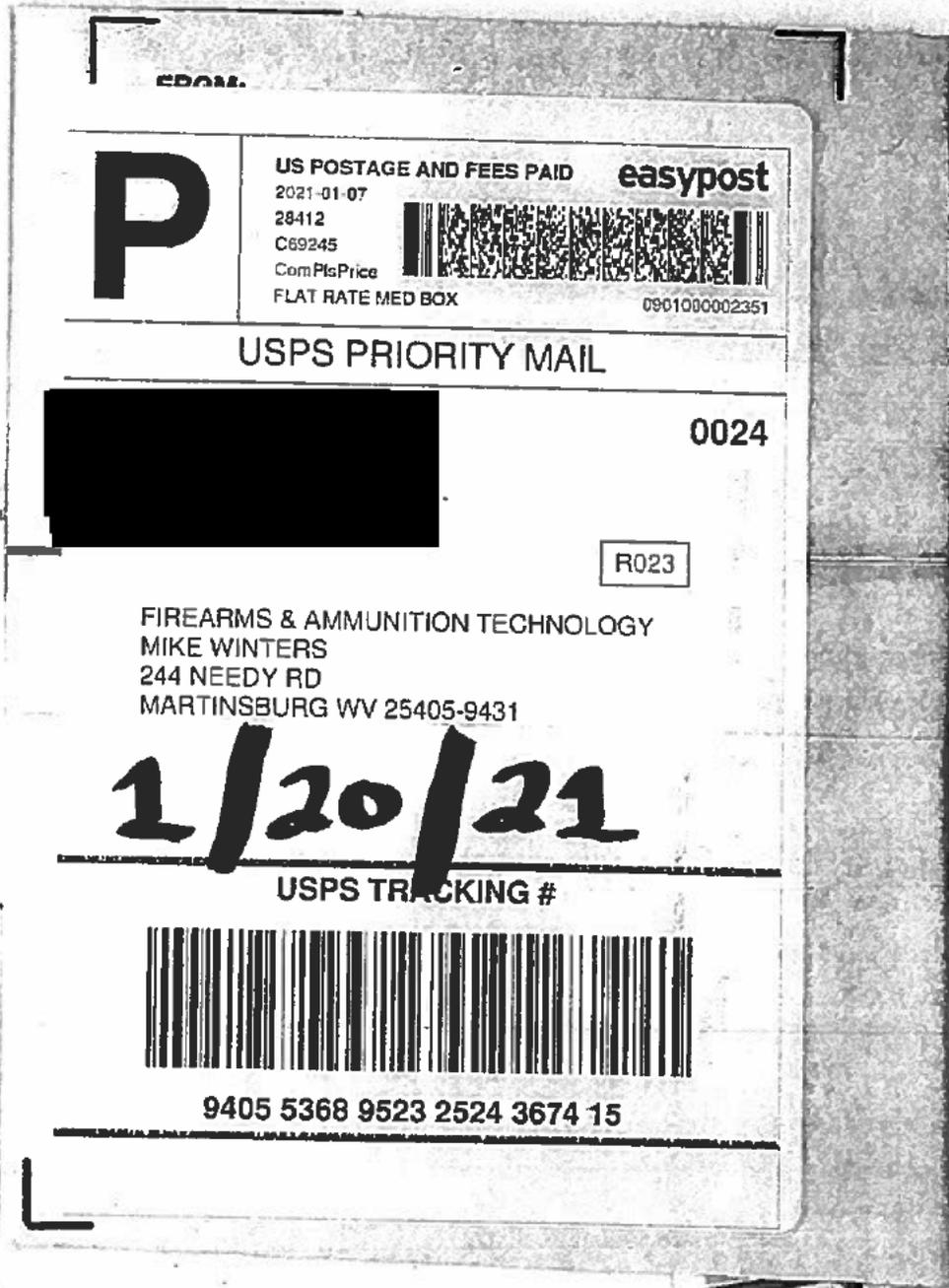
C105



**USPS TRACKING #**



**9405 5368 9523 2524 3651 45**



**P**

US POSTAGE AND FEES PAID

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0901000002351

USPS PRIORITY MAIL



0024

R023

FIREARMS & AMMUNITION TECHNOLOGY  
MIKE WINTERS  
244 NEEDY RD  
MARTINSBURG WV 25405-9431

**1/20/21**

USPS TRACKING #



9405 5368 9523 2524 3674 15

January 7, 2021

EVAL.  
315-876

RECEIVED  
JAN 20 2021  
FATO  
BY:.....

ATF - Technical dept

Dear Sir,

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Thank you very much.



~~BAH~~

ONE  
RTN Label  
Retained  
w/EVAL. 315-876

RECEIVERS:

AR-9 - EVAL.  
315-876-0A\$

AR-10 - EVAL.  
317-414

AR-15 - EVAL.  
317-416

AR-15 S\$ EVAL.  
317-418

1911 - EVAL.  
317-420

TOTAL: 5



U.S. Department of Justice

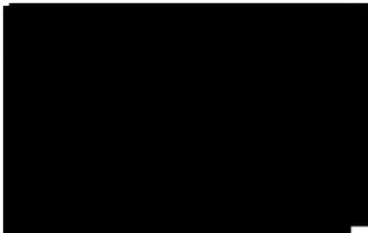
Bureau of Alcohol, Tobacco,  
Firearms and Explosives

Martinsburg, WV 25403

www.atf.gov

903050:MCP  
3311/301066

July 16, 2013



**RECEIVED**  
JAN 20 2021  
FATP  
BY: .....

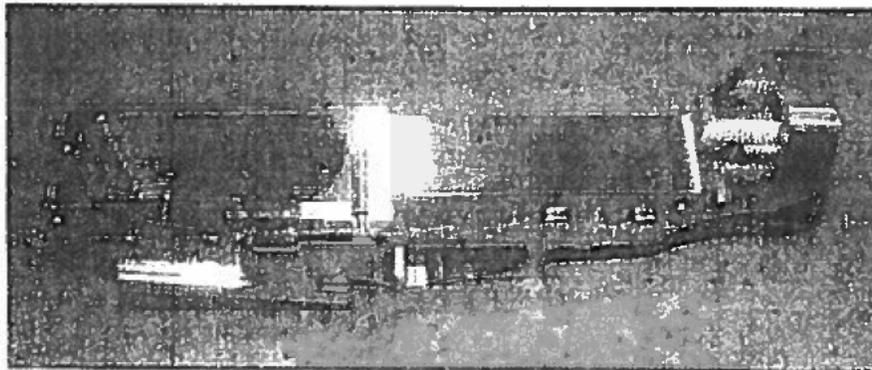
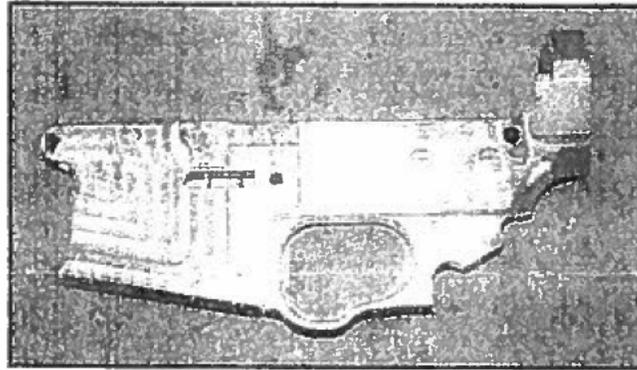
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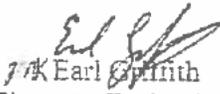
Submitted prototype sample

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We thank you for your inquiry and trust that the foregoing has been responsive to your request.

Sincerely yours,

  
Earl Smith  
Chief, Firearms Technology Branch

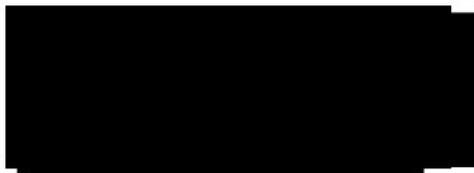
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	ComPisPrice	
FLAT RATE MED BOX	0901000002348	

**USPS PRIORITY MAIL**

FIREARMS & AMMUNITION TECHNOLOGY  
MIKE WINTERS  
244 NEEDY ROAD  
MARTINSBURG WV 25405

**0004**

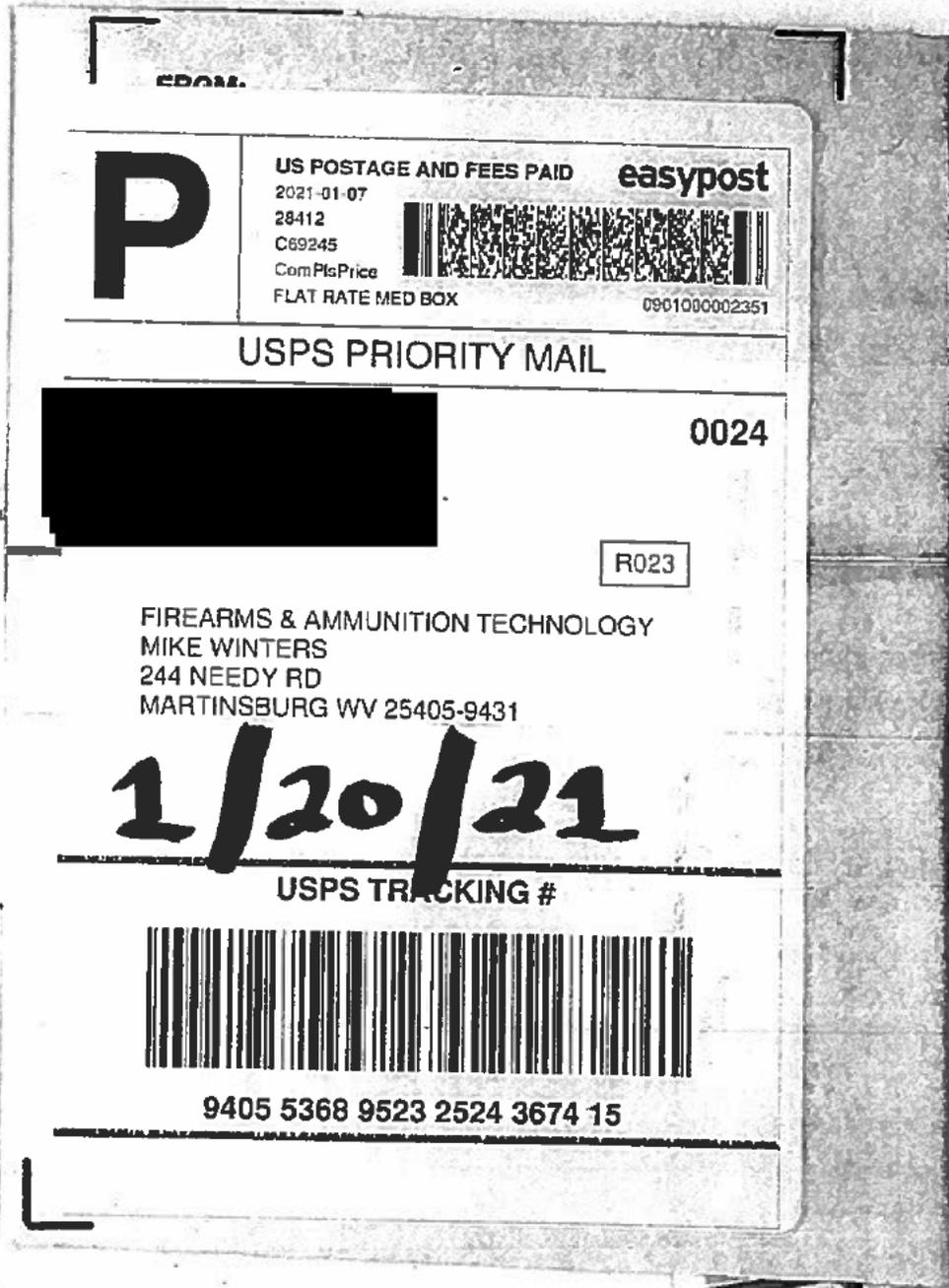
C105



**USPS TRACKING #**



**9405 5368 9523 2524 3651 45**



**P**

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easypost

2021-01-07

28412

C69245

ComPlsPrice

FLAT RATE MED BOX



0901000002351

USPS PRIORITY MAIL



0024

R023

FIREARMS & AMMUNITION TECHNOLOGY  
MIKE WINTERS  
244 NEEDY RD  
MARTINSBURG WV 25405-9431

1/20/21

USPS TRACKING #



9405 5368 9523 2524 3674 15

January 7, 2021

EVAL.  
315-876

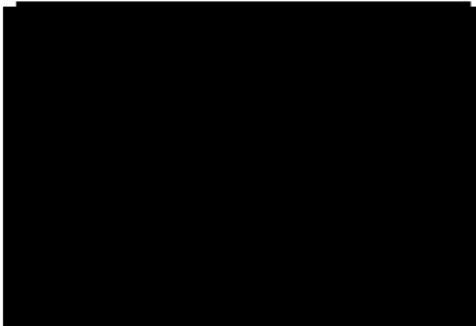
RECEIVED  
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FATO  
BY:.....

ATF - Technical dept

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~~BAH~~

ONE  
RTN Label  
Retained  
w/EVAL. 315-876

RECEIVERS:

AR-9 - EVAL.  
315-876-0A\$

AR-10 - EVAL.  
317-414

AR-15 - EVAL.  
317-416

AR-15 S\$ EVAL.  
317-418

1911 - EVAL.  
317-420

TOTAL: 5



U.S. Department of Justice

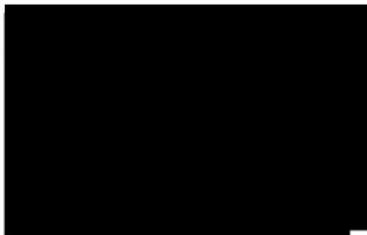
Bureau of Alcohol, Tobacco,  
Firearms and Explosives

Martinsburg, WV 25403

www.atf.gov

903050:MCP  
3311/301066

July 16, 2013



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JAN 20 2021  
FATP  
BY: .....

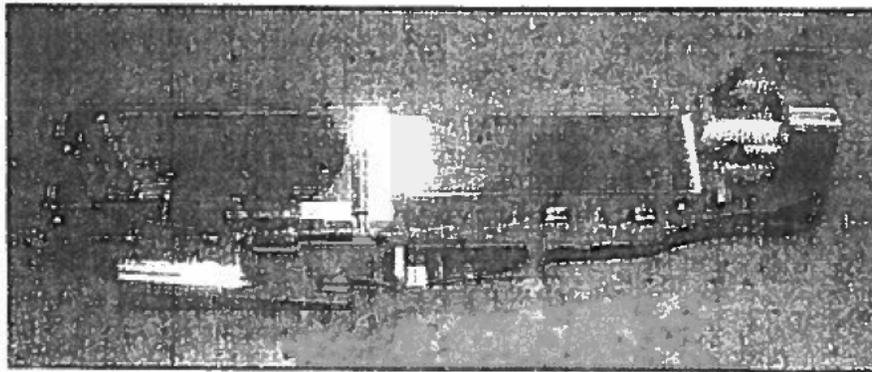
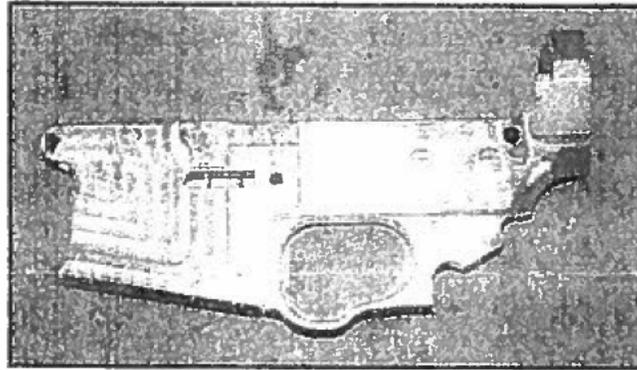
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Submitted prototype sample

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Earl Smith  
Chief, Firearms Technology Branch

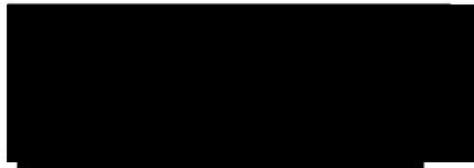
<b>P</b>	<b>US POSTAGE AND FEES PAID</b>	<b>easypost</b>
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	25405	
	C69245	
	ComPisPrice	
FLAT RATE MED BOX	0901000002348	

**USPS PRIORITY MAIL**

FIREARMS & AMMUNITION TECHNOLOGY  
MIKE WINTERS  
244 NEEDY ROAD  
MARTINSBURG WV 25405

**0004**

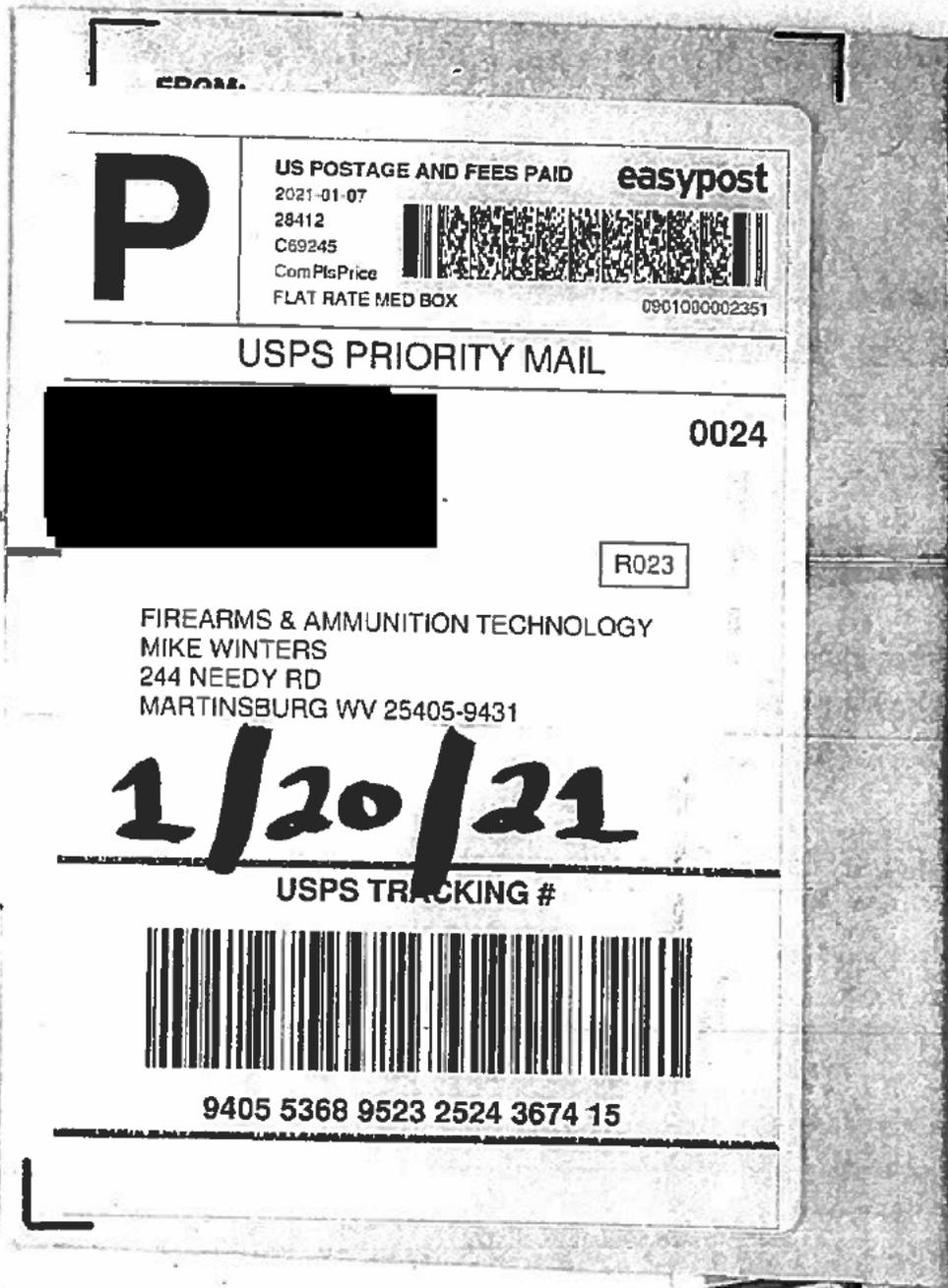
C105



**USPS TRACKING #**



**9405 5368 9523 2524 3651 45**



**P**

US POSTAGE AND FEES PAID

easypost

2021-01-07

28412

C69245

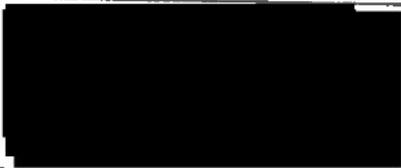
ComPlsPrice

FLAT RATE MED BOX



0901000002351

USPS PRIORITY MAIL



0024

R023

FIREARMS & AMMUNITION TECHNOLOGY  
MIKE WINTERS  
244 NEEDY RD  
MARTINSBURG WV 25405-9431

**1/20/21**

USPS TRACKING #



9405 5368 9523 2524 3674 15



U.S. Department of Justice

Bureau of Alcohol, Tobacco,  
Firearms and Explosives

Firearm & Explosives Imports Branch

EVAL.  
317-596

Martinsburg, WV

www.atf.gov

July 14, 2021

901030:RH

5330



ONE  
AR-15  
Receiver

RECEIVED  
AUG 26 2021  
BY: FATD

This is in response to your permit application dated, June 15<sup>th</sup>, 2021, to import twenty-five thousand (25,000) [REDACTED] "FIREARM PARTS : LOWER RECEIVER, AR15 80%" into the United States.

The Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) was unable to determine the import status of the [REDACTED] "FIREARM PARTS : LOWER RECEIVER, AR15 80%" described on your application from the information provided. The regulations (27 CFR 478.116) provide that the director may authorize the conditional importation of firearms for the purpose of examining and testing the firearms, in order to determine the import status.

We have conditionally approved your permit application to allow you to import one (1) [REDACTED] "FIREARM PARTS : LOWER RECEIVER, AR15 80%" to the Firearms Technology Industry Services Branch (FTISB) for an import evaluation. When submitting firearms to ATF for examination and testing, please enclose the following documentation:

- (1) A copy of this letter and corresponding ATF Form 6 Part 1 permit;
- (2) Manufacturer's information for the firearm;
- (3) The reason(s) for testing the firearm; and
- (4) Any additional information that will assist FTISB in the examination and testing of the firearm

[REDACTED]

This permit is authorized under the condition that the firearm be shipped under U. S. Customs and Border Protection supervision directly to the:

Director  
Bureau of Alcohol, Tobacco, Firearms and Explosives  
Attention: Firearms Technology Industry Services Branch  
244 Needy Road  
Martinsburg, WV 25405  
(304) 616-4300

If a determination is made that the firearm may not be imported, you have three alternatives:

- (1) Destroy the firearm;
- (2) Abandon the firearm to ATF or Customs; or
- (3) Arrange for exportation of the firearm from the United States pursuant to an export license issued by the Office of Defense Trade Controls, Department of State, if existing U.S. Government policy does not preclude the issuance of a license for such exportation.

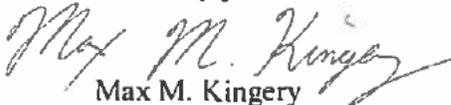
Samples may be shipped to ATF via FedEx, FedEx Ground or the United Parcel Service. All freight shipments and courier delivery shipments can only be received Monday through Thursday between 0800 and 1500 hours; or Friday 0800 to 1330. Please call the Firearms Technology Industry Services Branch at (304) 616-4300 should you need additional assistance. Do not ship any type of ordnance, explosives or hazardous materials to the Firearms Technology Industry Services Branch.

You must provide specific instructions detailing your wishes concerning the lawful disposition of the firearm. If such instructions are not received within 60 days of the notification from the Firearms Technology Industry Services Branch regarding the completion of our examination, the firearm will be considered abandoned and will be disposed of according to the needs of the government.

For questions related directly to the evaluation or an evaluation status check please contact the Firearms and Technology Division at 304-616-4300 or via email at fire\_tech@atf.gov.

We trust that the foregoing information will be of assistance to you. Should you have further questions or concerns relative to this matter, please do not hesitate to call Examiner [REDACTED] at [REDACTED] or email [REDACTED] and refer to the nine-digit permit number located in the top right hand corner of this letter.

Sincerely yours,

  
Max M. Kingery

Chief, Firearms and Explosives Imports Branch

U.S. Department of Justice  
Bureau of Alcohol, Tobacco, Firearms and Explosives

### Application and Permit for Importation of Firearms, Ammunition and Defense Articles

Not for use by Members of the United States Armed Forces.

For ATF Use Only	For Applicant's Optional Use	
Permit No. (Valid for 24 months from the date appearing in Item 19 below) NPR No	Internal Control/Reference #	E-mail Address (Optional)
[Redacted]	[Redacted]	[Redacted]

**Section I - Application (Submit in triplicate) - For Applicant Use**

1. Federal Firearms License (If Any)	2. Telephone No. (Including Extension No.)	3. Country of Exportation
License No. (1-xx-xxx-xx-xx-xxxx) [Redacted]	[Redacted]	TAIWAN
Expiration Date [Redacted]		

4. Name and Address of Customs Broker (Including Zip Code)	5. Applicant's Name and Address (Including Zip Code)
[Redacted]	[Redacted]
Check here if permit is to be returned to Customs Broker <input type="checkbox"/>	Check here if permit is to be returned to applicant <input checked="" type="checkbox"/>

6. Name and Address of Foreign Seller, if any	7. Name and Address of Foreign Shipper
[Redacted]	[Redacted]

**8. Description of Firearms and Ammunition (For firearms, enter (SG)-Shotgun; (RI)-Rifle; (PI)-Pistol; (RE)-Revolver; (DD)-Destructive Device; (MG)-Machinegun)**

	Name and Address of Manufacturer City and State or City and Country	Type (Pump, Receiver, SG, RI, PI, RE, DD, MG)	Caliber Gauge or Size	Quantity (Each type)	Unit Cost (U.S. Currency)	U.S. Muni- tions Import List Category	Model (required)	Length of Barrel (Inches)	Overall Length (Inches)	Serial No.	New (N) or Used (U)
Firearms	<input type="checkbox"/> See Attachment										
Defense Articles	[Redacted]			Requested: 25000, Granted: 1	0	(A)	Description <b>SEE ATTACHED OVERFLOW PAGE</b>				
Ammunition	<input type="checkbox"/> See Attachment	Core Material (Lead, Steel etc.)	(Ball Wad- cutter, Shot, AP, Tracer) (Rounds)								

9. Certification of Origin. The items sought for importation in block 8

a. Do not contain parts or components produced by or for the U.S. military and do not contain parts or components manufactured with U.S. military technical data or assistance.

b. Contain parts or components produced by or for the U.S. military or parts or components manufactured with U.S. military technical data or assistance.

c. Contain parts or components produced by or for the U.S. military or components manufactured with U.S. technical data or assistance that were sold abroad pursuant to a Direct Commercial Sale licensed by the Department of State.

10. Specific Purpose of Importation, Including Final Recipient, If Known (Use additional sheets, if necessary)  
RESALE

11. Are You Registered as an Importer Pursuant to The Arms Export Control Act of 1976 Yes  No

12. If "Yes," Give Importer's Registration No. and Expiration Date (A-xx-xxx-xxxx)  
[Redacted]

Under the penalties provided by law, I declare that I have examined this application, including the documents submitted in support of it, and, to the best of my knowledge and belief, it is true, correct, and complete.

13. Name of Applicant (Printed) [Redacted]	14. Signature of Applicant DIGITALLY SIGNED	15. Title CFO/OWNER	16. Date 08/15/2021
---	--	------------------------	------------------------

**Section II - For ATF Use Only (Please make no entries in this section) SEE ATTACHED PAGE FOR RESTRICTIONS**

17. The Application Has Been Examined and the Importation of the Firearms, Ammunition, and Defense Articles Described Herein is:

Approved  Disapproved for the Reason Indicated Here or on Attached Letter  Returned Without Action for Additional Information  Conditionally Approved

Partially Approved for the Reason Indicated Here or on Attached Letter  Withdrawn By Applicant Without Action  No Permit Required

18. Signature of the Director, Bureau of Alcohol, Tobacco, Firearms and Explosives  
Imports Branch Chief [Signature]

19. Date  
07/14/2021

**U.S. Department of Justice**  
Bureau of Alcohol, Tobacco, Firearms and Explosives

Permit Number: [REDACTED]

Internal Control Number:

---

**OVERFLOW PAGE**

---

Defence Articles - PRODUCT TYPE IS FIREARM PARTS : LOWER RECEIVER, AR15 80%, FORGED, BLACK ANODIZED  
MATERIAL: 7075-T6

U.S. Department of Justice  
Bureau of Alcohol, Tobacco, Firearms and Explosives

Permit No: [REDACTED]  
VALID FOR 24 MONTHS AFTER  
THE DATE OF APPROVAL

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**RESTRICTIONS**

---

1	BUREAU OF ALCOHOL, TOBACCO, FIREARMS AND EXPLOSIVES - DEPARTMENT OF JUSTICE
2	THIS PERMIT IS VALID FOR TWO YEARS FROM THE DATE IN BLOCK #19
3	NOTE: THIS IS TO CERTIFY THAT THIS IS A TRUE ATTACHMENT SHEET FOR THIS PERMIT.
4	CONDITIONAL IMPORTATION PER ATTACHMENT . SEE LETTER ATTACHED (CBW, FTZ., FTISB EXAMINATION ETC.)



RECEIVED  
SEP 24 2021  
BY: FA7D

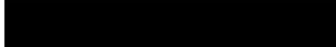
EVAL:  
317-864

September 23, 2021

Bureau of Alcohol, Tobacco, Firearms, and Explosives  
Firearms & Ammunition Technology Division  
Attn: FTISB  
244 Needy Road Suite 1600  
Martinsburg, WV 25405

ONE AR-9 TYPE  
RECEIVER

To whom it may concern,

 is seeking a determination letter for the provided sample.

This provided sample is an 80% lower receiver for an AR9.

**Features excluded from being a completed firearm.**

- Safety selector hole
- Trigger assembly holes
- Fire control pocket

**Features that are included on our 80% blank.**

- Takedown pin holes
- Mag catch group
- Bolt catch group
- Ejector block and Mag stop group
- Magwell
- Grip mounting hole
- Rear tension hole
- Buffer tube threads
- Buffer tube detent
- Takedown pin detents
- Safety selector detent

**Construction materials**

- Aluminum 6061-T6

Sincerely,



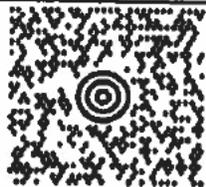
Owner

FIREARMS & AMMUNITION TECHNOLO  
244 NEEDY ROAD  
MARTINSBURG WV 25405

1 LBS

1 OF 1

SHIP TO:



PA 161 0-10



**UPS GROUND**

TRACKING #: 1Z 69A 6V9 03 3623 3634



BILLING: P/P



XOL 21.09.06 NV45 38 0A 09/2021™

1 LBS

1 OF 1



SHIP TO:  
ATTN: FTISB  
FIREARMS & AMMUNITION TECHNOLOGY  
SUITE 1600  
244 NEEDY ROAD  
MARTINSBURG WV 25405

9/24/21

RECEIVED  
SEP 24 2021

BY: FAIP



MD 217 9-10



UPS GROUND

TRACKING #: 1Z 69A 6V9 03 3567 3045

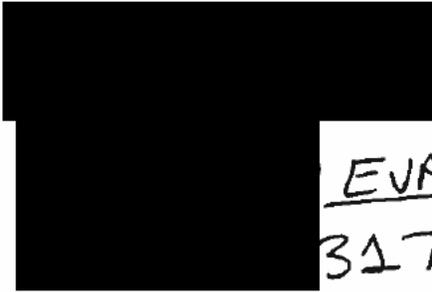


BILLING: P/P

FIREARMS & AMMUNITION TECHNOLOGY  
244 NEEDY RD  
SUITE 1600  
MARTINSBURG WV 25405



1021\*



EVAL.  
327-866

RECEIVED  
SEP 24 2021  
BY: FATO

September 23, 2021

Bureau of Alcohol, Tobacco, Firearms, and Explosives  
Firearms & Ammunition Technology Division  
Attn: FTISB  
244 Needy Road Suite 1600  
Martinsburg, WV 25405

To whom it may concern,



is seeking a determination letter for the provided sample.

This provided sample is an 80% lower receiver for an AR15.

Features excluded from being a completed firearm.

- Safety selector hole
- Trigger assembly holes
- Fire control pocket

ONE  
AR-15  
TYPE  
Receiver

Features that are included on our 80% blank.

- Takedown pin holes
- Grip mounting hole
- Rear tension hole
- Buffer tube threads
- Buffer tube detent
- Takedown pin detents
- Safety selector detent

Construction materials

- Aluminum 6061-T6

Sincerely,



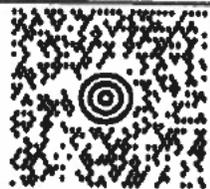
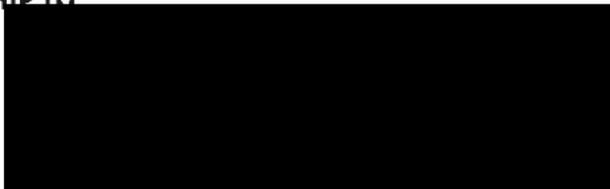
Owner

FIREARMS & AMMUNITION TECHNOLO  
244 NEEDY ROAD  
MARTINSBURG WV 25405

1 LBS

1 OF 1

SHIP TO:



**PA 161 0-10**



**UPS GROUND**

TRACKING #: 1Z 69A 6V9 03 2743 7628



BILLING: P/P

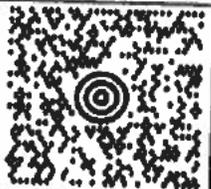


XOL 21.09.06 NY45 38 0A 09/2021\*

1 LBS 1 OF 1

**SHIP TO:**  
 ATTN: FTISB  
 FIREARMS & AMMUNITION TECHNOLOGY  
 SUITE 1600  
 244 NEEDY ROAD  
 MARTINSBURG WV 25405

9124122

 **MD 217 9-10**  


**UPS GROUND**  
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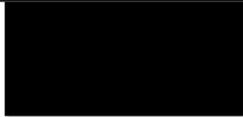
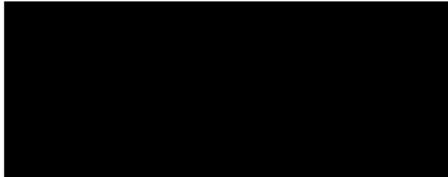
BILLING: P/P



1202/09/2021 09:00:00 NY45 38.0A 09/2021  
 1202/09/2021 08:48:00 MD 02  
 1202/09/2021 08:48:00 MD 02  
 1202/09/2021 08:48:00 MD 02

**WOOD - MFL**

**RECEIVED**  
 SEP 24 2021  
 BY: KATO



EVAL.  
317-868

RECEIVED  
SEP 24 2021  
BY: FATD

September 23, 2021

Bureau of Alcohol, Tobacco, Firearms, and Explosives  
Firearms & Ammunition Technology Division

Attn: FTISB  
244 Needy Road Suite 1600  
Martinsburg, WV 25405

To whom it may concern,



is seeking a determination letter for the provided sample.

This provided sample is an 80% lower receiver for an AR15.

**Features excluded from being a completed firearm.**

- Safety selector hole
- Trigger assembly holes
- Fire control pocket

ONE  
AR-15  
TYPE  
RECEIVER

**Features that are included on our 80% blank.**

- Takedown pin holes
- Mag catch group
- Bolt catch group
- Magwell
- Grip mounting hole
- Buffer tube threads
- Buffer tube detent
- Takedown pin detents
- Safety selector detent

**Construction materials**

- Aluminum 6061-T6

Sincerely,



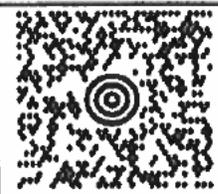
Owner

FIREARMS & AMMUNITION TECHNOLO  
244 NEEDEY ROAD  
MARTINSBURG WV 25405

1 LBS

1 OF 1

SHIP TO:



**PA 161 0-10**



**UPS GROUND**

TRACKING #: 1Z 69A 6V9 03 3796 9017



BILLING: P/P



XOL 21.09.05 NV45 39.0A 09/2021\*

RECEIVED  
SEP 24 2021  
BY: KATD

244 NEEDY ROAD MARTINSBURG WV 25405

SHIP TO: [REDACTED] FL 1 OF 1

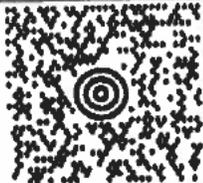
ATTN: WOOD

FIREARMS 1269A 6V9 03 1124 MUNITION TECHNOLOGY

SUITE 1 SEP 24 08:08:10 2021

244 NEEDY ROAD  
MARTINSBURG WV 25405

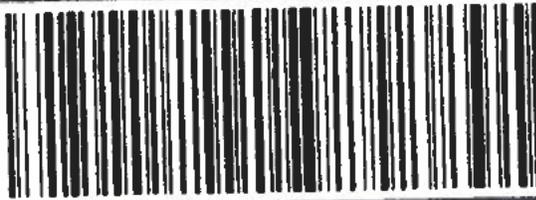
9/24/21

 MD 217 9-10



**UPS GROUND**

TRACKING #: 1Z 69A 6V9 03 1124 7872



BILLING: P/P

 TM

XOL 21.09.06 NV45 38.0A 09/2021

EVAL: 317-998

To whom it may concern,

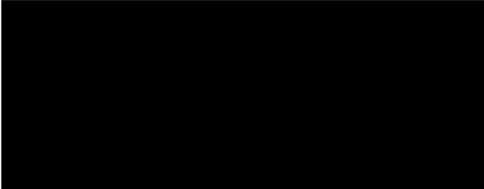
RECEIVED  
OCT 06 2021  
KATO  
BY: .....

[REDACTED] of [REDACTED] s submitting the enclosed three (AR15, AR9, and AR45 style) partial lower receivers for classification determination. The products are made of 6061 aluminum and partially machined out. We are requesting a determination letter of your findings be returned with the lowers after your inspection is complete.

THREE  
RECEIZERS

Thank you for your time,

[REDACTED]

<b>P</b>	<b>US POSTAGE AND FEES PAID</b>	<b>easypost.</b> <small>easypost.com/shipit</small>
	2021-10-04 25405 C1656276 ComPlsPrice FLAT RATE MED BOX	 0901000003677
<b>USPS PRIORITY MAIL</b>		
BUREAU OF ALCOHOL, TOBACCO, FIREARMS, AND EXPLOSIVES FIREARMS & AMMUNITION TECHNOLOGY DIVISION ATTN: FTISB 244 NEEDEY ROAD SUITE 1600 MARTINSBURG WV 25405		<b>0004</b>
		
Shipped via <b>XPS</b> <small>ship.com</small>		
<b>USPS TRACKING #</b>		
		
<b>9405 5361 0899 2429 8493 00</b>		
(return label)		

**P**

US POSTAGE AND FEES PAID

easypost.

2021-10-04

26554

C1856276

ComPisPrice

FLAT RATE MED BOX



0901000003677

USPS PRIORITY MAIL



0004

*10/6/21*

BUREAU OF ALCOHOL, TOBACCO, FIREAR  
ATTN: FTISE  
244 NEFDY ROAD SUITE 1600  
MARTINSBURG WV 25405

**RECEIVED**  
OCT 06 2021  
BY: *FTIR*

Shipped via **XPS** ship.com

USPS TRACKING #



9405 5361 0899 2429 8392 64



EVAL.

318-400

RECEIVED  
NOV 26 2021  
BY: FATO

November 24, 2021

Bureau of Alcohol, Tobacco, Firearms, and Explosives  
Firearms & Ammunition Technology Division

Attn: FTISB

244 Needy Road Suite 1600  
Martinsburg, WV 25405

To whom it may concern,

[Redacted] is seeking a determination letter for the provided sample.

This provided sample is an 80% lower receiver for an AR10.

**Features excluded from being a completed firearm.**

- Safety selector hole
- Trigger assembly holes
- Fire control pocket

ONE  
AR-10  
Receiver

**Features that are included on our 80% blank.**

- Takedown pin holes
- Mag catch group
- Bolt catch group
- Magwell
- Grip mounting hole
- Rear tension hole
- Buffer tube threads
- Buffer tube detent
- Takedown pin detents
- Safety selector detent

**Construction materials**

- Aluminum 6061-T6

Sincerely,



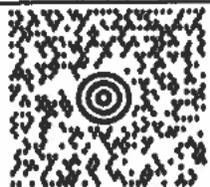
Owner

FIREARMS & AMMUNITION TECHNOLO  
244 NEEDY ROAD  
MARTINSBURG WV 25405

1 LBS

1 OF 1

SHIP TO:



PA 161 0-10



**UPS GROUND**

TRACKING #: 1Z 69A 6V9 03 0859 3192



BILLING: P/P



XOL 21.11.24 NY45-99 0A 11/2021\*

RECEIVED  
NOV 26 2021  
BY: FAD

1 LBS 1 OF 1

SHIP TO:  
ATTN: FTISB  
FIREARMS & AMMUNITION TECHNOLOGY  
SUITE 1600  
244 NEEDY ROAD  
MARTINSBURG WV 25405



MD 217 9-10



UPS GROUND

TRACKING #: 1Z 69A 6V9 03 1311 9588



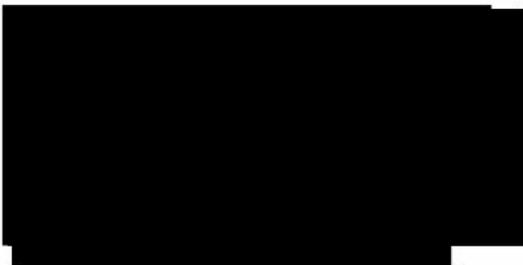
BILLING: P/P

XOL 21.11.24 WV45 49 0A 11/2021



# EVALUATION

RECEIVED  
MAY 10 2022  
BY: FATD



Three Receivers Samples  
AR-15 type / AR-9 type  
FATD Photographs are provided.

Eval 320 – 538  
Eval 320 – 540  
Eval 320 – 542



RECEIVED  
MAY 10 2022

Tech Branch,

Please find the enclosed parts for determination of classification as "Firearm".

BY: FATD

We have enclosed 3 samples of various designs for evaluation. Can you please determined based on final rule 2021R-05F? We sell to other dealers and wholesalers and would sell by themselves, no other parts, cutters, jigs, etc. These are sold standalone and out of 6061 or 7075 aluminum.

Best regards,

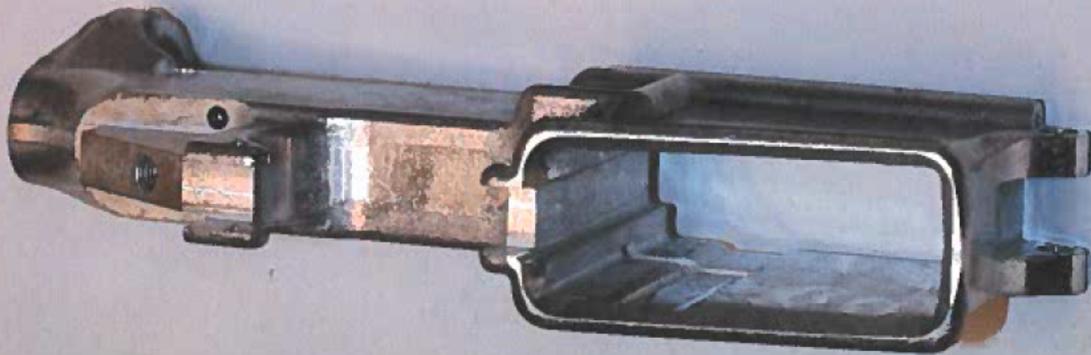
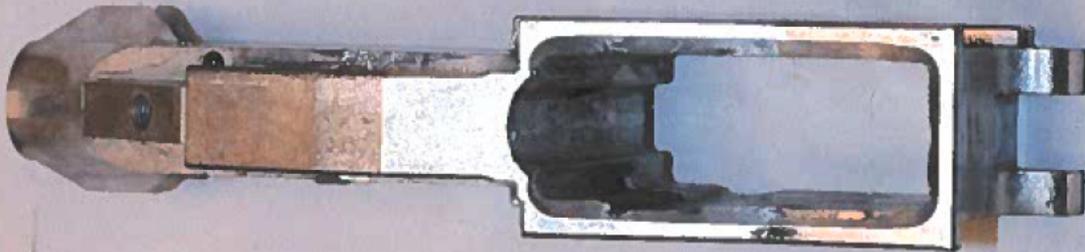
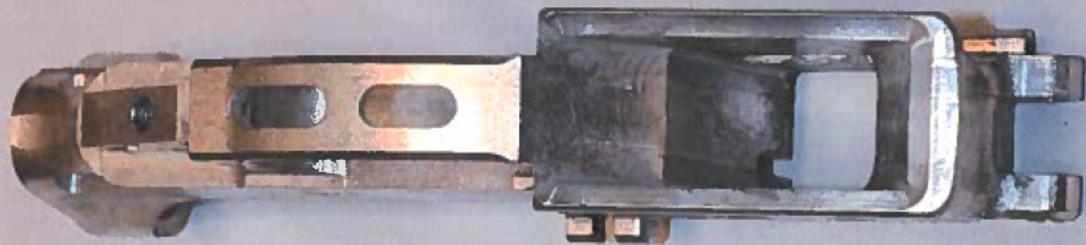
Qty Rec: 3

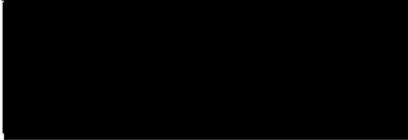


FATD



FATD



FIREARMS AMMUNITION TECHNOLOG 3177219787 BUREAU OF ALCOHOL, TOBACCO, FI 244 NEEDY ROAD MARTINSBURG WV 25405		<b>4 LBS</b>	<b>1 OF 1</b>
		<b>RS</b>	DWT: 8,6,4
<b>SHIP TO:</b> 			
	<b>IN 462 4-09</b>		
			
<b>UPS GROUND</b>			
TRACKING #: 1Z 7R4 A13 90 0267 9320			
			
BILLING: P/P DESC: *87181168* RETURN SERVICE			
			
<small>XOL 22.04.20    "W" by 19.04.03/2022</small>			

4 LBS 1 OF 1  
DWT: 8.64

SHIP TO:  
FIREARMS AMMUNITION TECHNOLOGY DI  
3177219787  
BUREAU OF ALCOHOL, TOBACCO, FIREARM  
244 NEEDY ROAD  
MARTINSBURG WV 25405

MD 217 9-10

UPS GROUND  
TRACKING #: 1Z 7R4 A13 03 0728 2715

BILLING: P/P

CHANGE S: LEFT  
MARTINSBURG WV 25405

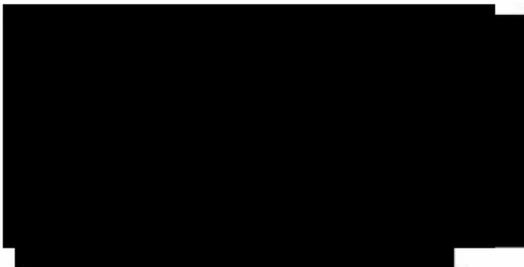
NOOD - MFL

1Z7R4A130307282715

RECEIVED  
MAY 10 2022  
BY: [Signature]

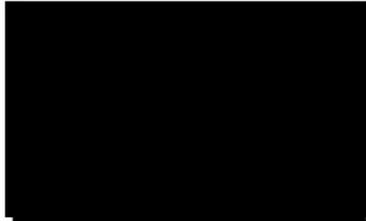
# EVALUATION

RECEIVED  
MAY 10 2022  
BY: FATD



Three Receivers Samples  
AR-15 type / AR-9 type  
FATD Photographs are provided.

Eval 320 – 538  
Eval 320 – 540  
Eval 320 – 542



RECEIVED  
MAY 10 2022  
BY: FATD

Tech Branch,

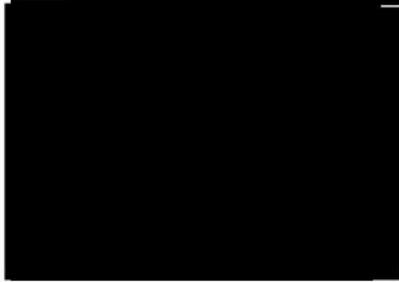
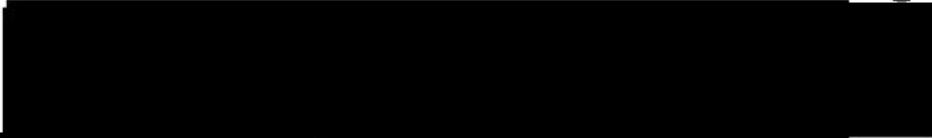
Please find the enclosed parts for determination of classification as "Firearm".

BY: .....

We have enclosed 3 samples of various designs for evaluation. Can you please determined based on final rule 2021R-05F? We sell to other dealers and wholesalers and would sell by themselves, no other parts, cutters, jigs, etc. These are sold standalone and out of 6061 or 7075 aluminum.

Best regards,

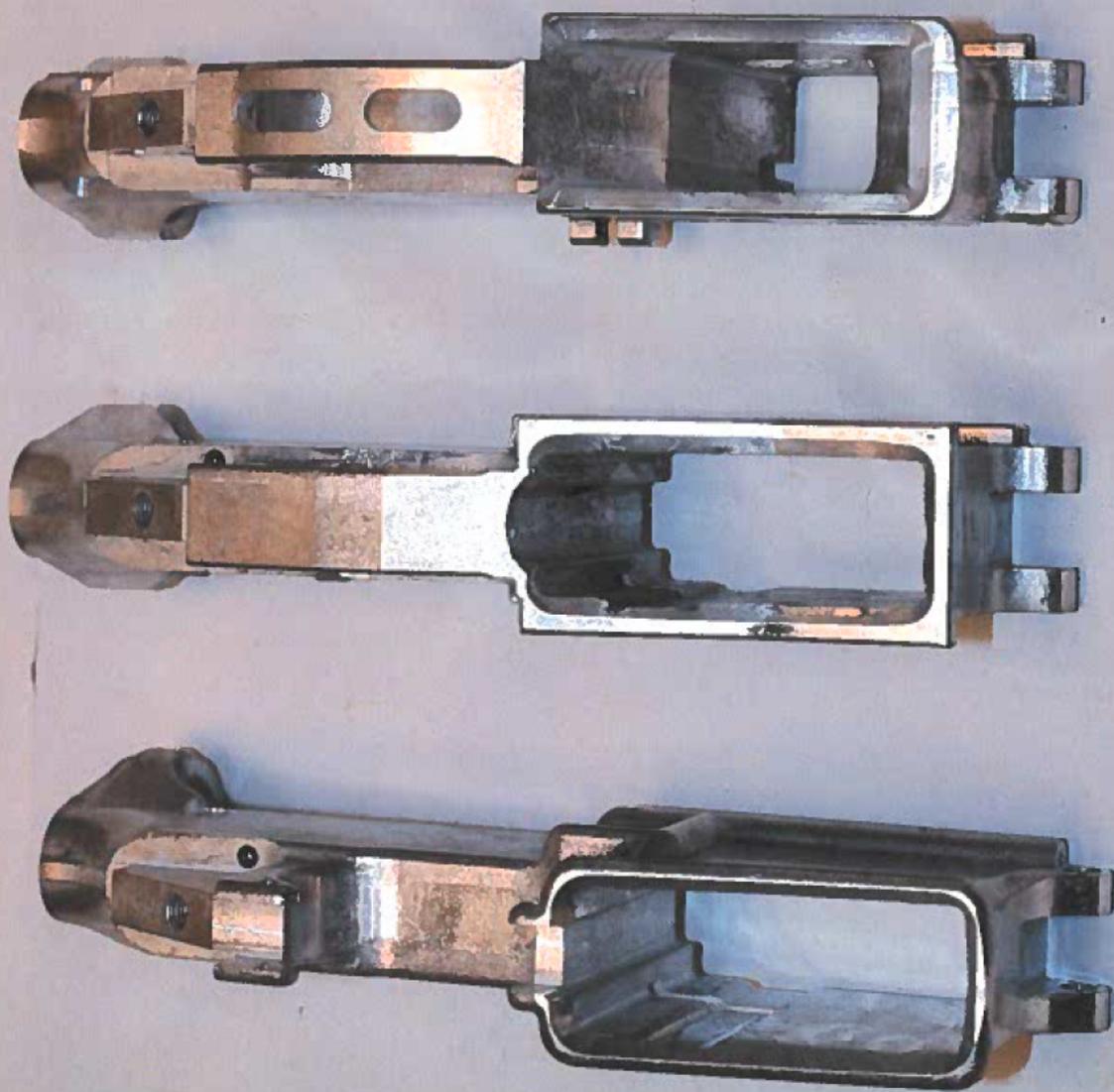
Qty Rec: 3



FATD



FATD



FIREARMS AMMUNITION TECHNOLOG 3177219787 BUREAU OF ALCOHOL, TOBACCO, FI 244 NEEDY ROAD MARTINSBURG WV 25405		<b>4 LBS</b>	<b>1 OF 1</b>
		<b>RS</b>	DWT: 8,6,4
<b>SHIP TO:</b> 			
	<b>IN 462 4-09</b>		
			
<b>UPS GROUND</b>			
TRACKING #: 1Z 7R4 A13 90 0267 9320			
			
BILLING: P/P DESC: *87181168* RETURN SERVICE			
			
<small>XOL 22.04.20    "W" by 19.04.03/2022</small>			

4 LBS 1 OF 1  
DWT: 8.64

**SHIP TO:**  
FIREARMS AMMUNITION TECHNOLOGY DI  
3177219787  
BUREAU OF ALCOHOL, TOBACCO, FIREARM  
244 NEEDY ROAD  
MARTINSBURG WV 25405

 **MD 217 9-10**  


**UPS GROUND**  
TRACKING #: 1Z 7R4 A13 03 0728 2715



BILLING: P/P

**NOOD - MFL**  
CHANGE S: LEFT  
MARTINSBURG WV 25405  
244 NEEDY RD

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MAY 10 2022  
BY: *KAD*

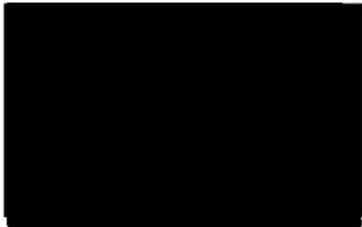
# EVALUATION

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MAY 10 2022  
BY: FATD



Three Receivers Samples  
AR-15 type / AR-9 type  
FATD Photographs are provided.

Eval 320 – 538  
Eval 320 – 540  
Eval 320 – 542



RECEIVED  
MAY 10 2022

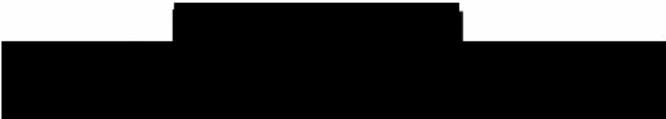
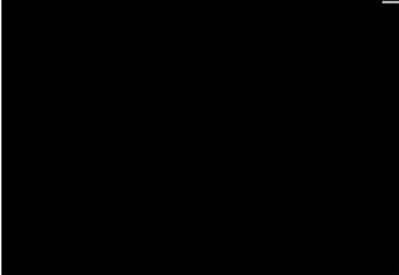
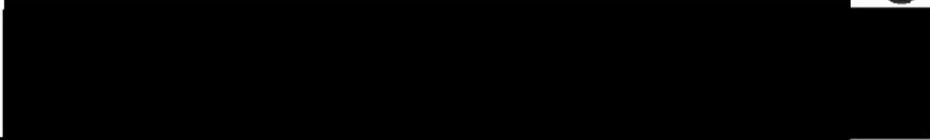
Tech Branch,

Please find the enclosed parts for determination of classification as "Firearm". BY: FATD

We have enclosed 3 samples of various designs for evaluation. Can you please determined based on final rule 2021R-05F? We sell to other dealers and wholesalers and would sell by themselves, no other parts, cutters, jigs, etc. These are sold standalone and out of 6061 or 7075 aluminum.

Best regards,

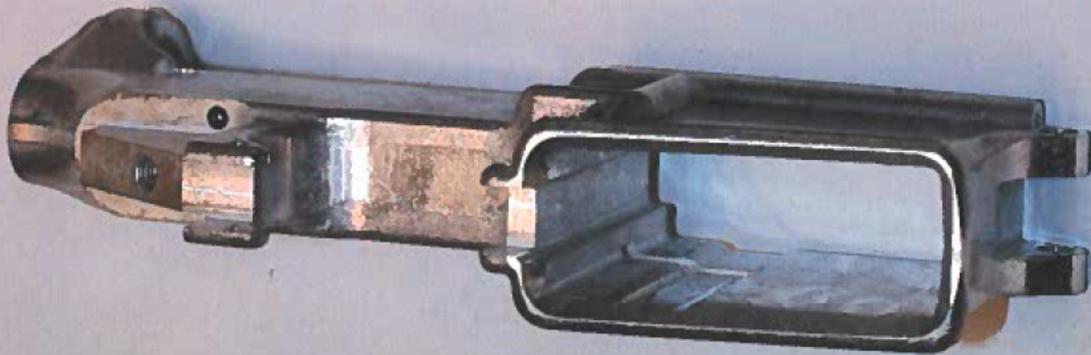
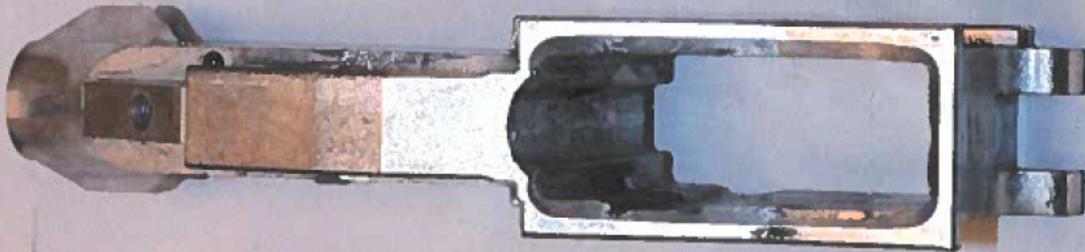
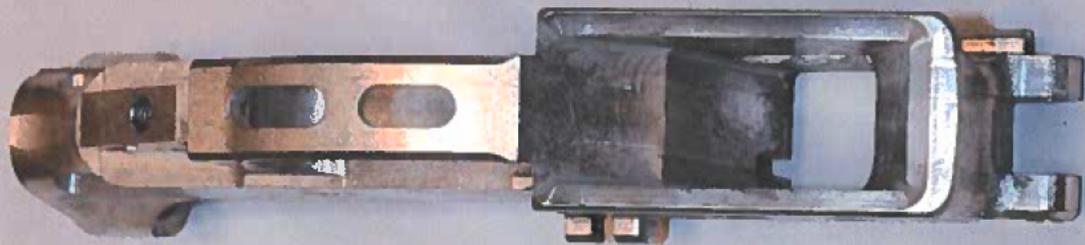
Qty Rec: 3



FATD



FATD



FIREARMS AMMUNITION TECHNOLOG 3177219787 BUREAU OF ALCOHOL, TOBACCO, FI 244 NEEDY ROAD MARTINSBURG WV 25405		<b>4 LBS</b>	<b>1 OF 1</b>
		<b>RS</b>	DWT: 8,6,4
<b>SHIP TO:</b> 			
	<b>IN 462 4-09</b>		
			
<b>UPS GROUND</b>			
TRACKING #: 1Z 7R4 A13 90 0267 9320			
			
BILLING: P/P DESC: *87181168* RETURN SERVICE			
			
<small>XOL 22.04.20 "W" by 19.04.03/2022</small>			

4 LBS 1 OF 1  
DWT: 8.64

**SHIP TO:**  
 FIREARMS AMMUNITION TECHNOLOGY DI  
 3177219787  
 BUREAU OF ALCOHOL, TOBACCO, FIREARM  
 244 NEEDEY ROAD  
 MARTINSBURG WV 25405

 **MD 217 9-10**  


**UPS GROUND**  
 TRACKING #: 1Z 7R4 A13 03 0728 2715



BILLING: P/P

**NOOD - MFL**  
 CHANGE S: LEFT  
 MARTINSBURG WV 25405

**RECEIVED**  
 MAY 10 2022  
 BY: *KAD*



EVAL.

320-650

RECEIVED  
MAY 20 2022  
FATD  
BY: .....

May 18, 2022

Bureau of Alcohol, Tobacco, Firearms and Explosives  
Firearms Ammunition Technology Division  
244 Needy Rd  
STE 1600  
Martinsburg, WV, 25405

ONE  
AR-15 LOWER  
Receiver

To whom it may concern:

[REDACTED] is voluntarily resubmitting the enclosed sample for classification. The company requests a letter ruling determining the classification of the product as a firearm or not a firearm.

This blank receiver was designed using the regulatory guidance available from the EP lower determination letter dated March 4, 2014 from Earl Griffith, Chief of the Firearms Technology Branch (ATF) to [REDACTED] and published ATF determination letter from Kenney Enterprises, Inc. dated May 17, 2013 regarding the methodology used in the ATF process.

Our receiver blank was designed to the best of our ability to conform to the legal standards as understood from reviewing the previously mentioned letters and industry best practices.

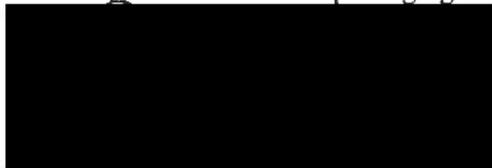
Our product was designed to have no tooling and/or machining processes done in the trigger pocket area and our manufacturing process does not include the use of additional support while molding. The trigger pocket area is a single-step process and is composed of the same material as the rest of the product. At no time during manufacture is a void created in the monolithic trigger pocket area. The Nylon material is injected in a single process. The brass inserts are introduced in the mold prior to the polymer injection.

This product requires tooling, machinery and approximately 1-2 hours of skilled labor to complete, thus making it not 'readily convertible' to a firearm.

Included with this sample is a print out of the completion instructions, readily available on the internet.

Please return the sample in the enclosed packaging. Thank you for your time and consideration.

Sincerely,

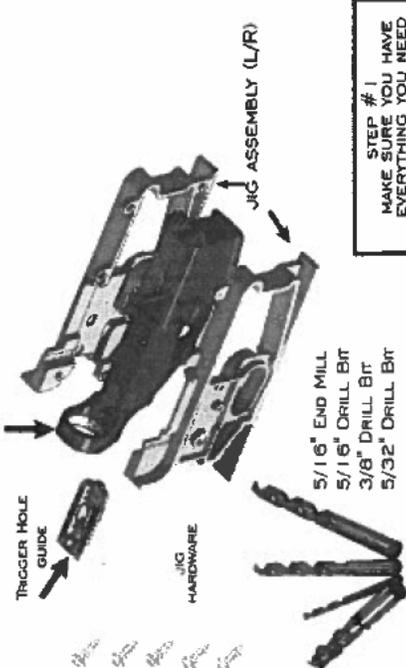


Enclosures

5/18/22, 11:19 AM

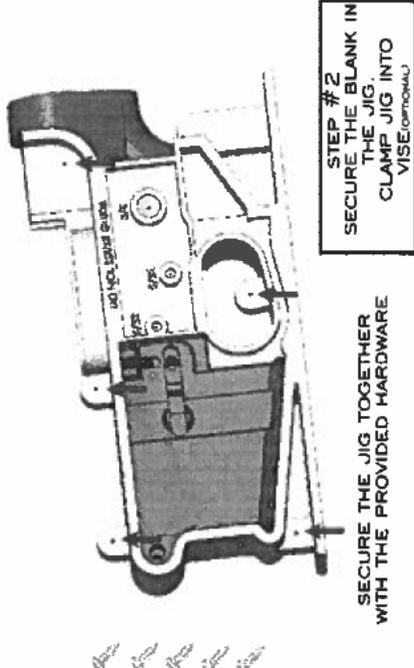
Instructions & Tutorials - Hynd 60

# FINISHING INSTRUCTIONS FOR THE LIBERATOR RECEIVER BLANK



**STEP #1**  
MAKE SURE YOU HAVE EVERYTHING YOU NEED

# FINISHING INSTRUCTIONS FOR THE LIBERATOR RECEIVER BLANK



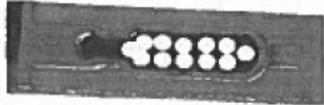
**STEP #2**  
SECURE THE BLANK IN THE JIG. CLAMP JIG INTO VISE.

SECURE THE JIG TOGETHER WITH THE PROVIDED HARDWARE

5/18/22, 11:19 AM

Instructions & Tutorials - Hynd 60

# FINISHING INSTRUCTIONS FOR THE LIBERATOR RECEIVER BLANK



USE THE 5/16" DRILL BIT TO REMOVE 5/8" OF NYLON LIKE THE PATTERN SHOWN LEAVING A SMALL MARGIN FROM THE JIG WALL TO ALLOW A SMOOTH FINISH FROM THE END MILL.



USE YOUR END MILL TO REMOVE THE REMAINING MATERIAL. THE EDGE LEFT FROM THE FIRST STEP CAN BE REMOVED NOW.

USE THE TOP OF THE BLANK AS YOUR ZERO MARK  
KEEP YOUR "RPM" BELOW 1800 TO REDUCE CHATTER AND EXCESS FRICTION AND HEAT

SET YOUR DEPTH TO 1/4" IN AND REPEAT STEP 3

**STEP #3**  
MILL THE TRIGGER POCKET

hynd60.com/instructions-tutorials

2/6

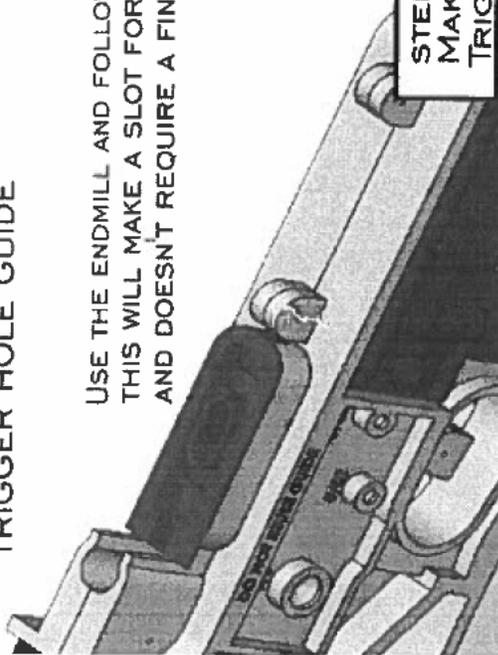
3/6

# FINISHING INSTRUCTIONS FOR THE LIBERATOR RECEIVER BLANK



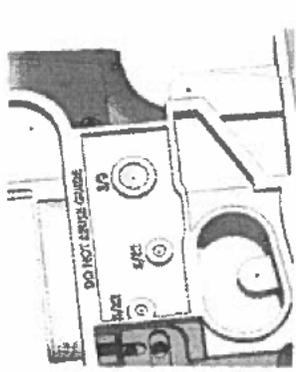
WITHOUT REMOVING THE JIG ASSEMBLY FROM THE VISE, REPLACE THE TRIGGER HOLE GUIDE

USE THE ENDMILL AND FOLLOW THE POCKET. THIS WILL MAKE A SLOT FOR THE TRIGGER AND DOESN'T REQUIRE A FINISHING PASS.



**STEP #4  
MAKE YOUR  
TRIGGER HOLE**

# FINISHING INSTRUCTIONS FOR THE LIBERATOR RECEIVER BLANK



WITH THE JIG PLACED FLAT ON ONE SIDE, USE A 3/8" DRILL BIT TO DRILL THE SAFETY SELECTOR HOLE AND A 5/32" BIT TO DRILL THE TRIGGER AND HAMMER PIN HOLES. DO NOT DRILL THESE HOLES ALL THE WAY FROM ONE SIDE TO THE OTHER. DRILL ONE SIDE THEN FLIP THE JIG AND DRILL THE OTHER. REMOVE THE LOWER FROM THE JIG AND FINISH BY DEBURRING WITH A SMALL FILE.

**STEP #5  
MAKE YOUR  
TRIGGER/HAMMER  
PIN HOLES**

## Pages

- About Us (<http://hybrid80.com/about-us>)
- ATF Letter (<http://hybrid80.com/atf-letter>)
- Contact Us (<http://hybrid80.com/contact-us>)
- Dealers (<http://hybrid80.com/dealers>)
- Home (<http://hybrid80.com/>)
- Instructions & Tutorials (<http://hybrid80.com/instructions-tutorials>)
- Products (<http://hybrid80.com/products>)
- Reviews (<http://hybrid80.com/reviews>)
- Warranty sign up page (<http://hybrid80.com/warranty-sign-up-page>)

5/18/22, 11:37 AM

label-200.png (762x1200)

**F**

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endicia**

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244 Needy Rd Ste 1600  
Martinsburg WV 25405-9431

**197**

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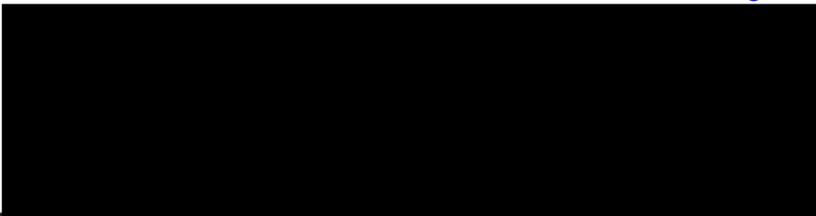
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MAY 20 2022  
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VELOPE

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**UNITED STATES  
MAIL SERVICE**



31 May 2022

EVAL.  
320-844

RECEIVED  
JUN 06 2022  
FATD  
BY: .....

Director  
Bureau of Alcohol, Tobacco, Firearms and Explosive  
Attention: Firearms Technology Industry Services Branch  
244 Needy Road  
Martinsburg, West Virginia 25405 USA

ONE  
Receiver

Dear Technology Branch,

I am submitting a sample for evaluation per a conditional ATF Import Permit of a dummy/display receiver for a RPD LMG.

1. See attached ATF Imports Letter and AFT Form 6
2. Manufacture name is [redacted] (see box 6 of ATF Form 6)
3. We would like to determine that this dummy/display receiver, it is not classified as a firearm and when used to build a display rifle, that the display rifle is not classified as a firearm. Also, we would like to determine that the dummy/display receiver is importable. Please note, display rifles would be assembled from parts current in the US and would not be imported with dummy/display receiver.

I look forward to your reply.

Sincerely yours,



Managing Director



U.S. Department of Justice

Bureau of Alcohol, Tobacco,  
Firearms and Explosives

Firearm & Explosives Imports Branch

Martinsburg, WV

www.atf.gov

April 11, 2022

RECEIVED  
JUN 06 2022

BY: FA10

901030:JS

5330



Dear Applicant,

This is in response to your permit application dated April 6<sup>th</sup>, 2022, to import defense articles into the United States.

The Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) was unable to determine the import status of the receivers described on your application from the information provided. Federal regulations at Title 27 CFR 478.116 and 478.113 provide that the Director may authorize the conditional importation of a firearm for the purpose of examining and testing the firearm in order to determine the import status.

We have conditionally approved your permit application to allow you to import one [redacted] display receiver for the RPD LMG to the Firearms Technology Industry Services Branch (FTISB) for an import evaluation. When submitting a firearm to ATF for examination and testing, please enclose the following documentation:

- (1) a copy of this letter and corresponding ATF Form 6 Part 1 permit;
- (2) manufacturers' information for the article;
- (3) the reason(s) for testing the article; and
- (4) any additional information that will assist FTISB in the examination and testing of the article.

This permit is authorized under the condition that the firearm be shipped under U. S. Customs and Border Protection supervision directly to the:

Director  
Bureau of Alcohol, Tobacco, Firearms and Explosives  
Attention: Firearms Technology Industry Services Branch  
244 Needy Road  
Martinsburg, WV 25405



(304) 616-4300

If a determination is made that the article may not be imported, you have three alternatives:

- (1) destroy the article;
- (2) abandon the article to ATF or Customs; or
- (3) arrange for exportation of the article from the United States pursuant to an export license issued by the Office of Defense Trade Controls, Department of State, if existing U.S. Government policy does not preclude the issuance of a license for such exportation.

Samples may be shipped to ATF via FedEx, FedEx Ground or the United Parcel Service. All freight shipments and courier delivery shipments can only be received Monday through Thursday between 0800 and 1500 hours; or Friday 0800 to 1330. Please call the Firearms Technology Industry Services Branch at (304) 616-4300 should you need additional assistance. Do not ship any type of ordnance, explosives or hazardous materials to the Firearms Technology Industry Services Branch.

You must provide specific instructions detailing your wishes concerning the lawful disposition of the article if the article is determined to be non-importable. If such instructions are not received within 60 days of the notification from the Firearms Technology Industry Services Branch regarding the completion of our examination, the article will be considered abandoned and will be disposed of according to the needs of the Government.

For questions related directly to the evaluation or an evaluation status check please contact the Firearms and Ammunition Technology Division at 304-616-4300 or via email at [fire\\_tech@atf.gov](mailto:fire_tech@atf.gov).

Should you have further questions or concerns relative to this matter, please do not hesitate to call Examiner [REDACTED] and refer to the nine-digit permit number located in the top right hand corner of this letter.

Sincerely yours,

A handwritten signature in cursive script that reads "Max M. Kingery".

Max M. Kingery  
Chief, Firearms and Explosives Imports Branch

**U.S. Department of Justice**  
 Bureau of Alcohol, Tobacco, Firearms and Explosives

# Application and Permit for Importation of Firearms, Ammunition and Defense Articles

**Not for use by Members of the United States Armed Forces.**

<b>For ATF Use Only</b>	<b>For Applicant's Optional Use</b>	
Permit No. (Valid for 24 months from the date appearing in Item 19 below.) NPR No.	Internal Control/Reference #	E-mail Address (Optional)
[REDACTED]	[REDACTED]	[REDACTED]

**Section I - Application (Submit in triplicate) - For Applicant Use**

1. Federal Firearms License (If Any)	2. Telephone No. (Including Extension No.)	3. Country of Exportation
License No. (x-xx-xxx-xx-xxxx)	[REDACTED]	TURKEY
Expiration Date		

4. Name and Address of Customs Broker (Including Zip Code)	5. Applicant's Name and Address (Including Zip Code)
[REDACTED]	[REDACTED]
Check here if permit is to be returned to Customs Broker. <input type="checkbox"/>	Check here if permit is to be returned to applicant. <input checked="" type="checkbox"/>

6. Name and Address of Foreign Seller, if any	7. Name and Address of Foreign Shipper
[REDACTED]	[REDACTED]

**8. Description of Firearms and Ammunition (For firearms, enter (SG)-Shotgun; (RI)-Rifle; (PI)-Pistol; (RE)-Revolver; (DD)-Destructive Device; (MG)-Machinegun)**

Name and Address of Manufacturer City and State or City and Country	Type (Frame, Receiver, SG, RI, PI, RE, DD, MG)	Caliber Gauge or Size	Quantity (Each type)	Unit Cost (U.S. Currency)	U.S. Muni- tions Import List Category	Model (required)	Length of Barrel (Inches)	Overall Length (Inches)	Serial No.	New (N) or Used (U)
a.	b.	c.	d.	e.	f.	g.	h.	i.	j.	k.
Firearms <input type="checkbox"/> See Attachment										
Defense Articles <input type="checkbox"/> See Attachment			Requested: 0 Granted: 1		(a)	Description SEE ATTACHED OVERFLOW PAGE				
Ammunition <input type="checkbox"/> See Attachment	Core Material (Lead, Steel etc.)	(Ball Wad-cutter, Shot, AP, Tracer) (Rounds)								

10. Specific Purpose of Importation, Including Final Recipient, If Known (Use additional sheets, if necessary)  
**RESALE**

11. Are You Registered as an Importer Pursuant to The Arms Export Control Act of 1976 Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	12. If "Yes," Give Importer's Registration No. and Expiration Date (A-xx-xxx-xxxx) [REDACTED]
--	--

Under the penalties provided by law, I declare that I have examined this application, including the documents submitted in support of it, and, to the best of my knowledge and belief, it is true, correct, and complete.

13. Name of Applicant (Printed) [REDACTED]	14. Signature of Applicant DIGITALLY SIGNED	15. Title Managing Director	16. Date 04/05/2022
---	--	--------------------------------	------------------------

**Section II - For ATF Use Only (Please make no entries in this section)** **SEE ATTACHED PAGE FOR RESTRICTIONS**

17. The Application Has Been Examined and the Importation of the Firearms, Ammunition, and Defense Articles Described Herein is:

Approved <input type="checkbox"/>	Disapproved for the Reason Indicated Here or on Attached Letter <input type="checkbox"/>	Returned Without Action for Additional Information <input type="checkbox"/>	Conditionally Approved <input checked="" type="checkbox"/>
Partially Approved for the Reason Indicated Here or on Attached Letter <input type="checkbox"/>	Withdrawn By Applicant Without Action <input type="checkbox"/>	No Permit Required <input type="checkbox"/>	

18. Signature of the Director, Bureau of Alcohol, Tobacco, Firearms and Explosives 19. Date

**U.S. Department of Justice**  
Bureau of Alcohol, Tobacco, Firearms and Explosives

Permit Number: [REDACTED]

Internal Control Number: [REDACTED]

---

**OVERFLOW PAGE**

---

Defense Articles - PRODUCT TYPE is FIREARM PARTS : SOLID STEEL DUMMY / DISPLAY RECEIVER FOR THE RPD LMG

**U.S. Department of Justice**  
Bureau of Alcohol, Tobacco, Firearms and Explosives

Permit No. [REDACTED]

VALID FOR 24 MONTHS AFTER  
THE DATE OF APPROVAL

---

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**RESTRICTIONS**

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7	CONDITIONAL IMPORTATION PER ATTACHMENT . SEE LETTER ATTACHED (CBW, FTZ, FTISB EXAMINATION ETC.)
---	---

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JUN 06 2022  
BY: *FATO*

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*6-6-22*

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# EVALUATION

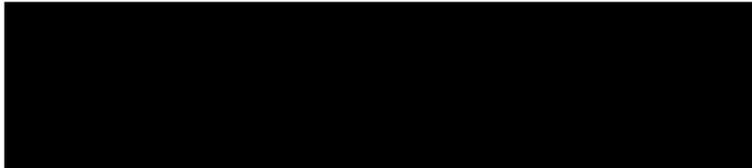
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**JUN 16 2022**  
**BY: FATD**



 Technologies

Eval 321 – 010 Display : Outer Shell, Rifle Model 

Eval 321 – 012 Display : Outer Shell, Pistol Model 



Bureau of Alcohol, Tobacco, Firearms, and Explosives  
Firearms & Ammunition Technology Division  
Attn: FTISB  
244 Needy Road  
Martinsburg, WV 25405

**RECEIVED**  
**JUN 16 2022**  
**FATD**  
**BY: .....**

June 13, 2020

Dear Sir/Madam,

We are writing to request a determination letter as to whether our display units would be affected by the ATF Final Rule 2021R-05F taking effect on August 24, 2022.

[REDACTED] is a manufacturer of optical sights (commonly called red dot sights) and we use long gun and pistol display units at consumer and trade shows which are based on 80% receivers.

Enclosed are samples of our handgun and long gun display units. All of our display unit inventory is identical in assembly but have different colored accessories (as shown with the photos versus enclosed sample) or by size (compact versus full sized handgun).

Our pistol display units are assembled with an unfinished 80% receiver, a slide, a barrel with copious amounts of JB Weld filled into the receiver and slide, and hardware bolts embedded into the pools of JB Weld to hold everything together. We feel that our display units have had significant amount of epoxy and hardware which prevents them from being readily converted.

Our rifle displays are assembled with an unfinished 80% lower receiver, stripped upper receiver (with forward assist), and handguard. Lower parts consist of a pivot pin and takedown pin with receiver extension and buttstock. There are no fire control group components installed and the takedown pin is JB Welded in the closed position. We feel that our displays have been rendered inert and would require significant modification or damage to be readily converted.

It is our hope that ATF could help us clarify where we stand with our trade show display unit inventory as we certainly intend to follow the law.

Respectfully,



EVAL.  
321-010

DISPLAY  
OUTER SHELL  
RIFLE



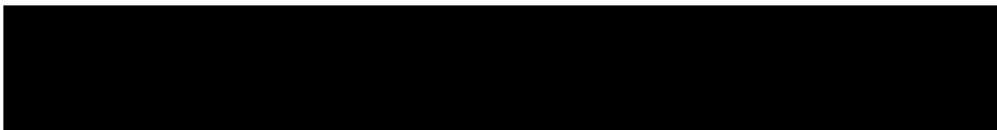
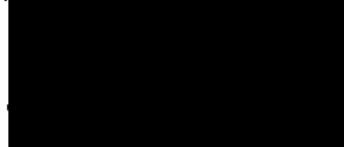
MODEL: [REDACTED]

Office Manager



EVAL.  
321-012

DISPLAY  
OUTER SHELL  
PISTOL





<u>EVAL.</u> 32A-010 RIFLE	<u>EVAL.</u> 32A-012 PISTOL
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RECEIVED

JUN 16 2022

BY: FATO

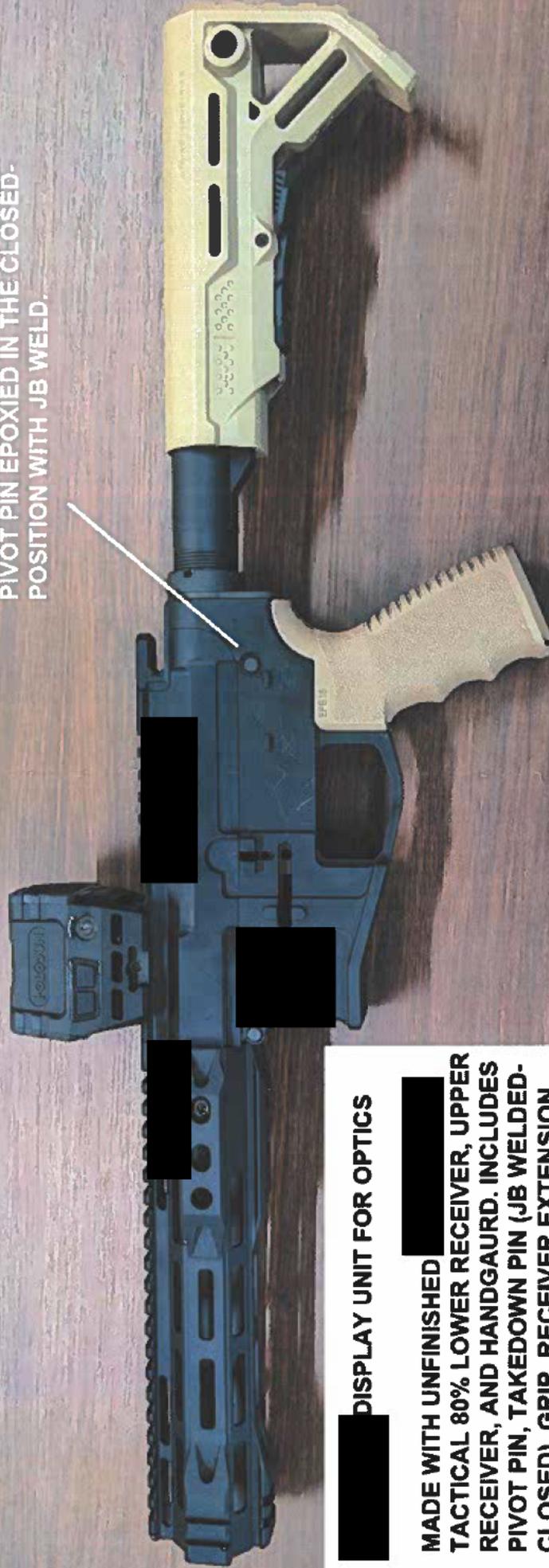


██████████ DISPLAY UNIT FOR OPTICS  
MADE WITH AN UNFINISHED ██████████ RECEIVER,  
██████████ SLIDE, AND ██████████ BARREL  
ATTACHED TOGETHER BY FILLING THE FRAME AND  
SLIDE WITH JB WELD AND USING HARDWARE  
BOLTS TO ACHNOR THE SLIDE, BARREL, AND  
RECEIVER TOGETHER.

THE FRAME IS UNFINISHED AND WOULD REQUIRE  
REMOVAL OF SEVERAL OUNCES OF CURED JB-  
WELD TO CONVERT.

██████████ THERE ARE NO FIRE CONTROL GROUP COM-  
██████████ PONENTS NOR ANY SLIDE COMPONENTS INSTALED.

PIVOT PIN EPOXIED IN THE CLOSED-  
POSITION WITH JB WELD.

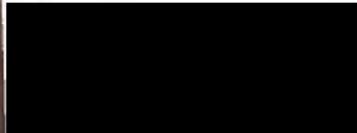


DISPLAY UNIT FOR OPTICS

MADE WITH UNFINISHED [REDACTED]  
TACTICAL 80% LOWER RECEIVER, UPPER  
RECEIVER, AND HANDGAUARD. INCLUDES  
PIVOT PIN, TAKEDOWN PIN (JB WELDED-  
CLOSED), GRIP, RECEIVER EXTENSION,  
BUTTSTOCK. THERE ARE NO FIRE CON-  
TROL COMPONENTS, BOLT OR BARREL  
PARTS OR ASSEMBLIES IN THESE UNITS.

**NOT A FIREARM**

**OPTICS DISPLAY FOR** [REDACTED]



9 LBS

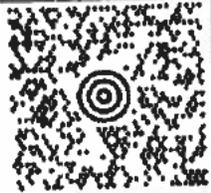
1 OF 1

DWT: 24,15,10

SHIP TO:  
ATTN: FTISB  
ATFE FIREARMS & AMMO TECH DIVI  
244 NEEDY RD  
MARTINSBURG WV 25405-9431

6/16/22

RECEIVED  
JUN 16 2022  
BY: FA7



MD 217 9-10



UPS NEXT DAY AIR SAVER 1P

TRACKING #: 1Z 164 4E8 13 9279 2579



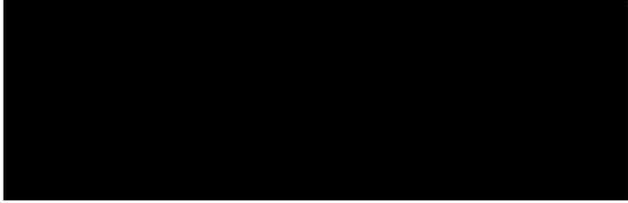
BILLING: P/P

6/16/22

Trx Ref No.: ps

SEE NOTICE ON REVERSE regarding UPS's liability limitations of liability for loss or damage to contents. UPS to act as forwarder for export control and  
regulations. Diversion contrary to law is prohibited. 9502 B 0621

MODEL NO.:



Chesapeake, June 23, 2022

EVAL. 321-122

Bureau of Alcohol Tobacco Firearms and Explosives  
Attn. Firearms and Ammunition Technology Division  
244 Needy Road  
Martinsburg, WV 25405

RECEIVED  
JUN 27 2022  
BY: FATD

**RE: Receiver Blank for the DMK line of firearms**

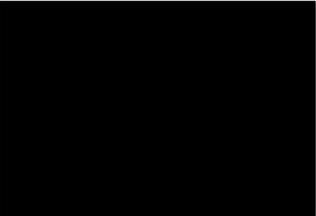
Dear Firearms and Ammunition Technology Division,

Attached to this letter is an article, receiver blank for the DMK line of firearms. The article was imported in 2017 using our approved Form 6 [REDACTED]

[REDACTED] Inc. submitted Form 6 [REDACTED] June 3, 2022, to the Imports Branch. Legal Examiner [REDACTED] was reviewing the submission and instructed [REDACTED] Inc. to send in the physical receiver blank to FATD/FTISB to determine the receiver blanks import status.

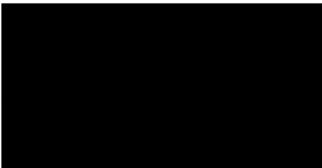
We have complied with Legal Examiner [REDACTED] request and have submitted the article as requested.

Please submit any return correspondence to [REDACTED] contact information below.



ONE  
AR-15  
LOWER  
RECEIVER

Sincerely yours,



Compliance Coordinator

FATD  
BATFE  
244 NEEDY ROAD  
MARTINSBURG WV 26405

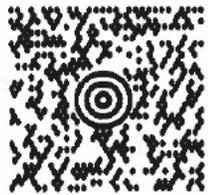
2 LBS

1 OF 1

**RS**

DWT: 13,11,2

SHIP TO:



**VA 234 9-10**



**UPS GROUND**

TRACKING #: 1Z 264 31Y 90 6104 4960



BILLING: P/P  
DESC: dmk.22  
RETURN SERVICE

REF 1:DMK.22

W9 25.0.7 Zebra ZP 450 25.0A 05/2022

[Redacted] SS 1 OF 1  
 DWT: 18,13,3

**SHIP TO:**  
 FATD  
 BATFE  
 244 NEEDY ROAD  
**MARTINSBURG WV 25405**

---


**MD 217 9-10**  


---

**UPS GROUND**  
 TRACKING #: 1Z 264 31Y A8 6169 1753

---



---

**BILLING: P/P**  
**ADULT SIGNATURE REQUIRED - MIN 21**

REF 1:DMK.22

WB 25.0.7 Zebra ZP 450 25.0A 06/2022

**RECEIVED**  
**JUN 27 2022**  
 BY: *KAID*

6/16/2022

EVAL 321-192

Firearms & Ammunition Technology Division  
BATFE  
244 Needy Rd  
Martinsburg, WV 25405

RECEIVED  
JUL 06 2022  
BY: KATO

RE: Firearm Classification

Good Day!

I am sending this letter to ask for a "Letter of Determination" for the classification of the enclosed item in reference to Final Rule 2021-R-05F, that addresses commonly named 80% AR Style Lower Receiver.

The [redacted] is a current FFL Type 07 which manufactures components for OEMs in the industry.

In 2013 we received the enclosed Determination Letter stating our product was not controlled by the GCA or NFA.

Under the new classification to take effect August 24, 2022, I am formally requesting a Determination under the new Rules for the enclosed item.

The features omitted from this configuration are as followed:

1. Fire-control cavity
2. Selector-lever hole
3. Trigger slot
4. Trigger pin hole
5. Hammer pin hole

ONE AR-15 LOWER

Under the original Determination letter, this product is sold as a Single Item Only in Bulk and NOT with any other complimentary products, example: Completion Jig or Firearm Kit.

Sincerely,

[Redacted signature block]

Enclosures:	Letter Request for Determination – 9/15/2013	A-1
	ATF Response Letter – 11/12/2013	A-2
	Reference Drawing: Lower-Brick-B	A-3
	Item for determination	
	Return Shipping Label - UPS	

A-1

9-15-2013

Firearms Technology Branch  
BATFE  
244 Needy Rd  
Martinsburg, WV 25405

RE: Firearm Classification

Good Day!

I am sending this letter to ask for a "Letter of Determination" for the classification of the enclosed items.

Specifically our inquiry is if the enclosed AR-style partially completed receiver is/would be classified as a "firearm" under the Gun Control Act of 1968 (GCA).

The [REDACTED] LLC is a current FFL Type 07 which manufactures AR-style receivers for commercial FFL Type 07 via variances filed through the BATFE. We have many requests to supply customers with partially complete receivers, which we chose not to until we get an "official determination of classification".

We recently were informed by Firearms Technology Branch via our recent inquiry that the "takedown" pocket addition is acceptable with the Fire Control Group pocket solid. After review, we are asking for a determination for the current configuration with a modified "takedown" pocket to a .800" length.

The features omitted from this configuration are as followed:

1. Fire-control cavity (need to be completed).
2. Selector-lever hole (need to be completed).
3. Trigger slot (need to be completed).
4. Trigger pin hole (need to be completed).
5. Hammer pin hole (need to be completed).

Please contact me directly for any questions or comments about this inquiry.

Sincerely,

[REDACTED]

Enclosures: Reference Drawing: Lower-Brick-B  
Inquired partially completed receiver  
Return Shipping Instructions

P/N: RT-20138-02 Rev. B

A-2



U.S. Department of Justice

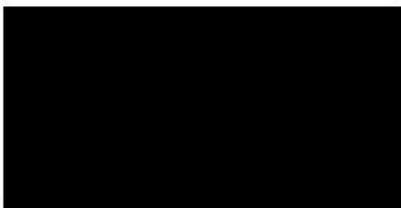
Bureau of Alcohol, Tobacco,  
Firearms and Explosives

Martinsburg, WV 25405

www.atf.gov

903050:RKD  
3311/301349

NOV 12 2013



RECEIVED  
JUL 05 2022  
KATD  
BY: .....

Dear [Redacted]

This is in reference to your submitted item, a partially machined AR-15 pattern receiver forging, along with supporting correspondence, recently received by the Firearms Technology Branch (FTB), Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF). You have submitted this forging (photo provided, next page) for classification under the Gun Control Act of 1968 (GCA).

Our Branch had previously determined that an AR-15 type receiver which has no machining of any kind performed in the area of the trigger/hammer recess might not be classified as a firearm. Such a receiver could have all other machining operations performed, including pivot-pin and takedown-pin hole(s) and clearance for the takedown-pin lug, but must be completely solid and un-machined in the trigger/hammer-recess area.

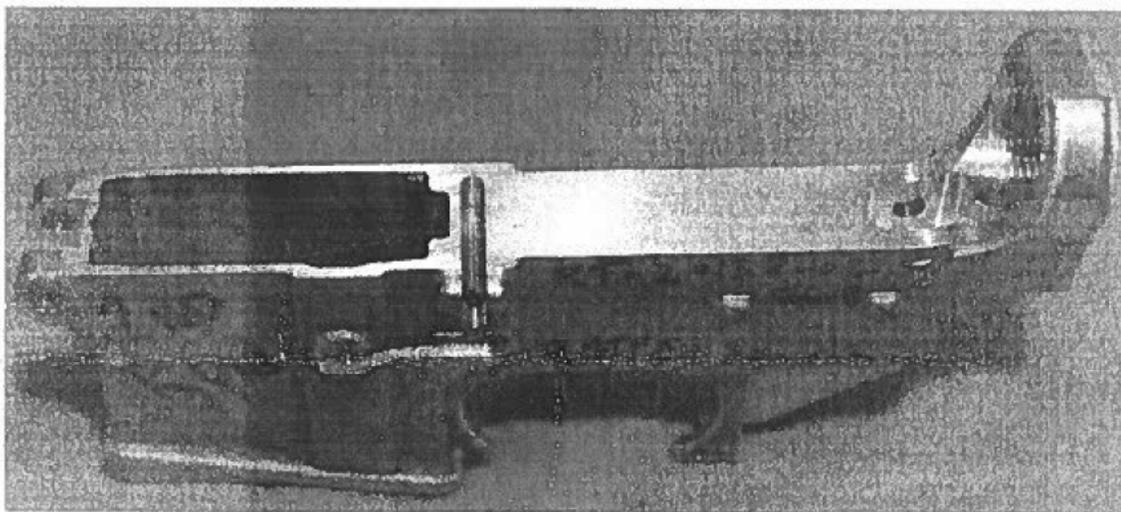
The FTB examination confirmed that the forging has been partially machined, with no machining of any kind performed in the area of the trigger/hammer recess. The machining operations performed for this sample include—

- The magazine well.
- Threads cut for receiver extension.
- Holes drilled for front and rear takedown pins.
- Holes drilled for front takedown detent and spring.
- Hole drilled and machined for magazine catch.
- Hole drilled for bolt-catch plunger and spring.

- Hole drilled for magazine-release button and spring.
- Holes drilled for trigger guard.
- Hole drilled for buffer detent and spring.
- Hole drilled and tapped for pistol grip screw.
- Take-down pin clearance recess not exceeding .800 inch in length.

Further, the trigger/hammer recess of your submitted sample (see below) is solid, and there are no index detents machined for the safety lever or the trigger/hammer pins. Accordingly, FTB finds that the submitted item is not a "firearm" as defined in the GCA. Please note that this classification is based on the item received and examined by our Branch. Any changes to its characteristics would require re-evaluation by FTB.

**Submitted forging**



We thank you for your inquiry and trust the foregoing has been responsive to your evaluation request. We will return your forging via your provided shipping account.

Sincerely yours,

  
Earl Griffith  
Chief, Firearms Technology Branch

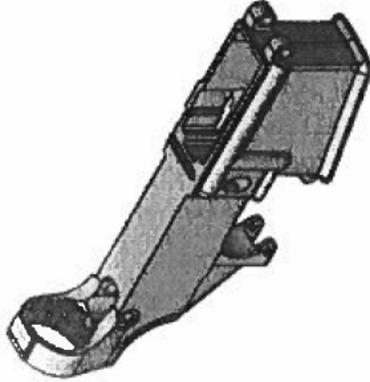
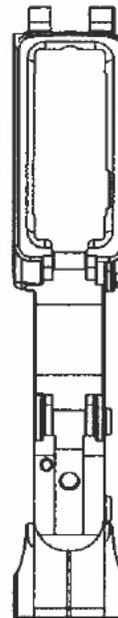
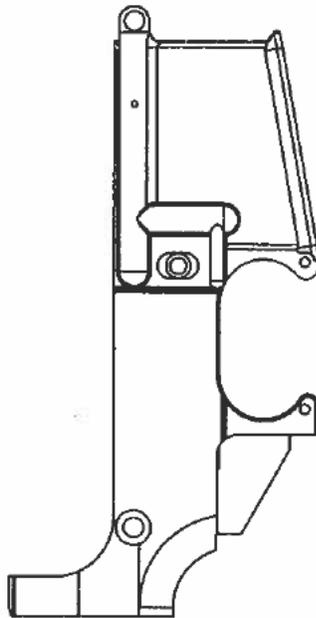
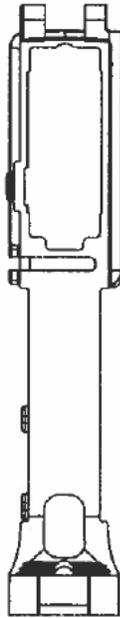
**Notes:**

1. Material Classification
- 2.

**BATFE REFERENCE DRAWING  
FOR FIREARM CLASSIFICATION**

**REVISIONS**

REV.	DESCRIPTION	DATE	APPROVED
5	Modified Length of Take-Down Pocket to 800"	5/16/2013	MJP



DATE	BY	CHKD	APP'D	REV
11/20/11				B
11/20/11				B

DATE	BY	CHKD	APP'D	REV
11/20/11				B
11/20/11				B

DATE	BY	CHKD	APP'D	REV
11/20/11				B
11/20/11				B

DATE	BY	CHKD	APP'D	REV
11/20/11				B
11/20/11				B

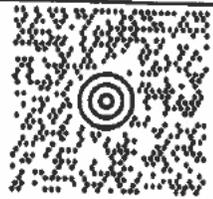
LOWER - BRICK-B  
 SIZE: Part No. B RT-20138-02  
 SCALE: 1:2 WEIGHT: SHEET 2 OF 2

BATFE  
2184109201  
244 NEEDY ROAD  
MARTINSBURG WV 25405

2 LBS  
**RS** DWT: 10,4,4

1 OF 1

SHIP TO:



**MN 557 0-01**



**UPS GROUND**

TRACKING #: 1Z Y08 46E 90 9841 2777



BILLING: P/P  
DESC: DETERMINATION RETURN  
RETURN SERVICE

Reference No. 1: DETERMINATION RETURN

XOL 22.06.15

NV45 27.0A 09/2022\*



UNI  
POS

**P**

US POSTAGE & FEES PAID  
PRIORITY MAIL  
ZONE 5 MEDIUM FLAT-RATE BOX  
ComplisPrice

99250009667735  
6724854  
FROM 55741



stamps  
endicia  
18 17 2022

**PRIORITY MAIL 3-DAY™**

0004



SHIP TO: BATFE  
Technology Division  
244 Needy Rd  
Martinsburg WV 25405-9431

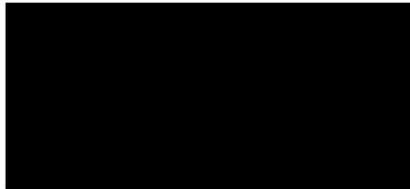
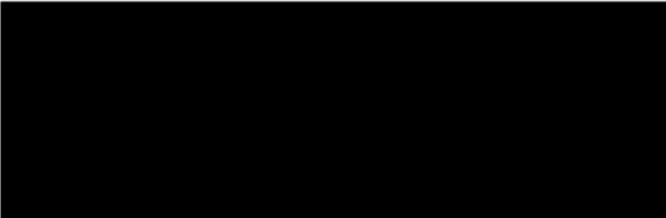
**715**

**USPS TRACKING #**



9405 5112 0254 0531 5805 85

**RECEIVED**  
JUL 05 2022  
BY: FATD



Bureau of Alcohol, Tobacco, Firearms, and Explosives  
Firearms Technology Industry Services Branch  
244 Needy Rd  
Martinsburg, WV 25405

RECEIVED  
JUL 05 2022

June 30, 2022

FATD  
BY: .....

Dear FTISB Specialist:

Inside this box you will find two 80% lower receiver samples and the associated permit paperwork. One is for an FR-9, which is essentially an AR-9 with some features removed to streamline manufacturing. The other is for an FR-16, which is essentially an AR-15 again with features removed.

There isn't much else to point out about them, so I believe this evaluation will be very straightforward, but please do not hesitate to contact me at [redacted] if you have any questions.

LOWER Receivers

Thank you,



EVAL. 321-194

FR-9

EVAL. 321-196

FR-16



U.S. Department of Justice

Bureau of Alcohol, Tobacco,  
Firearms and Explosives

Firearm & Explosives Imports Branch

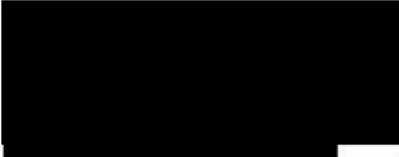
Martinsburg, WV

www.atf.gov

April 11, 2022

901030: CES

5330/ [REDACTED]



RECEIVED  
JUL 05 2022

BY: FA7D

Dear Applicant:

This is in response to your permit application dated April 1, 2022, to import defense articles into the United States.

The Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) was unable to determine the import status of the defense articles described on your application from the information provided. Federal regulations at Title 27 CFR 478.116 and 478.113 provide that the Director may authorize the conditional importation of a defense article for the purpose of examining and testing the defense article in order to determine the import status.

We have conditionally approved your permit application to allow you to import one each of the following models manufactured [REDACTED] FR-16, FR-9, FR-40, FR-45, FR-10 and FR-47 lower frames and one model FR-47 upper receiver to the Firearms Technology Industry Services Branch (FTISB) for an import evaluation. When submitting a firearm to ATF for examination and testing, please enclose the following documentation:

- (1) a copy of this letter and corresponding ATF Form 6 Part 1 permit;
- (2) manufacturers' information for the defense articles;
- (3) the reason(s) for testing the defense articles; and
- (4) any additional information that will assist FTISB in the examination and testing of the defense articles.

This permit is authorized under the condition that the defense articles be shipped under U. S. Customs and Border Protection supervision directly to the:

- 2 -

[REDACTED]  
Director  
Bureau of Alcohol, Tobacco, Firearms and Explosives  
Attention: Firearms Technology Industry Services Branch  
244 Needy Road  
Martinsburg, WV 25405  
(304) 616-4300

If a determination is made that the defense articles may not be imported, you have three alternatives:

- (1) destroy the defense articles;
- (2) abandon the defense articles to ATF or Customs; or
- (3) arrange for exportation of the defense articles from the United States pursuant to an export license issued by the Office of Defense Trade Controls, Department of State, if existing U.S. Government policy does not preclude the issuance of a license for such exportation.

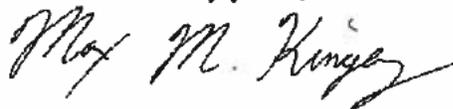
Samples may be shipped to ATF via FedEx, FedEx Ground or the United Parcel Service. All freight shipments and courier delivery shipments can only be received Monday through Thursday between 0800 and 1500 hours; or Friday 0800 to 1330. Please call the Firearms Technology Industry Services Branch at (304) 616-4300 should you need additional assistance. Do not ship any type of ordnance, explosives or hazardous materials to the Firearms Technology Industry Services Branch.

You must provide specific instructions detailing your wishes concerning the lawful disposition of the defense articles if they are determined to be non-importable. If such instructions are not received within 60 days of the notification from the Firearms Technology Industry Services Branch regarding the completion of our examination, the defense articles will be considered abandoned and will be disposed of according to the needs of the Government.

For questions related directly to the evaluation or an evaluation status check please contact the Firearms and Ammunition Technology Division at 304-616-4300 or via email at [fire\\_tech@atf.gov](mailto:fire_tech@atf.gov).

We trust that the foregoing information will be of assistance to you. Should you have further questions or concerns relative to this matter, please do not hesitate to call Examiner [REDACTED] at [REDACTED] and refer to the nine-digit permit number located in the top right hand corner of this letter.

Sincerely yours,



Max M. Kingery  
Chief, Firearms and Explosives Imports Branch

ATF Supp 000669

U.S. Department of Justice  
Bureau of Alcohol, Tobacco, Firearms and Explosives

OMB No. 1140-0005 (12/31/2022)

### Application and Permit for Importation of Firearms, Ammunition and Defense Articles

Not for use by Members of the United States Armed Forces.

<b>For ATF Use Only</b> Permit No. (Valid for 24 months from the date appearing in Item 19 below.) NPR No [REDACTED]	<b>For Applicant's Optional Use</b> Internal Control/Reference # [REDACTED] E-mail Address (Optional) [REDACTED]
--	---

**Section I - Application (Submit in triplicate) - For Applicant Use**

1. Federal Firearms License (If Any) License No. (x-xx-xxx-xx-xx-xxxx) [REDACTED] Expiration Date 08/01/2023	2. Telephone No. (Including Extension No.) [REDACTED]	3. Country of Exportation TAIWAN
---	---	-------------------------------------

4. Name and Address of Customs Broker (Including Zip Code) [REDACTED]	5. Applicant's Name and Address (Including Zip Code) [REDACTED]
--	--

Check here if permit is to be returned to Customs Broker.  Check here if permit is to be returned to applicant.

6. Name and Address of Foreign Seller, if any [REDACTED]	7. Name and Address of Foreign Shipper [REDACTED]
---	--

**8. Description of Firearms and Ammunition (For firearms, enter (SG)-Shotgun; (RI)-Rifle; (PI)-Pistol; (RE)-Revolver; (DD)-Destructive Device; (MG)-Machinegun)**

	Name and Address of Manufacturer City and State or City and Country a.	Type (Pistol, Rifle, Shotgun, SG, RI, PI, RE, DD, MG) b.	Caliber Gauge or Size c.	Quantity (Each type) d.	Unit Cost (U.S. Currency) e.	U.S. Munitions Import List Category f.	Model (required) g.	Length of Barrel (Inches) h.	Overall Length (Inches) i.	Serial No. j.	New (N) or Used (U) k.
Firearms	SEE ATTACHMENT										
Defense Articles	SEE ADDITIONAL SHEETS										
Ammunition	Core Material (Lead, Steel etc.)	(Ball Wad-cutter, Shot, AP, Tracer) (Rounds)									

10. Specific Purpose of Importation, Including Final Recipient, If Known (Use additional sheets, if necessary)  
**USE IN MANUFACTURING**

11. Are You Registered as an Importer Pursuant to The Arms Export Control Act of 1976 Yes  No

12. If "Yes," Give Importer's Registration No. and Expiration Date (A-xx-xxx-xxxx) [REDACTED]

Under the penalties provided by law, I declare that I have examined this application, including the documents submitted in support of it, and, to the best of my knowledge and belief, it is true, correct, and complete.

13. Name of Applicant (Printed) [REDACTED]	14. Signature of Applicant DIGITALLY SIGNED	15. Title Purchasing Manager	16. Date 04/01/2022
---	--	---------------------------------	------------------------

**Section II - For ATF Use Only (Please make no entries in this section) SEE ATTACHED PAGE FOR RESTRICTIONS**

17. The Application Has Been Examined and the Importation of the Firearms, Ammunition, and Defense Articles Described Herein is:

Approved  Disapproved for the Reason Indicated Here or on Attached Letter  Returned Without Action for Additional Information  Conditionally Approved

Partially Approved for the Reason Indicated Here or on Attached Letter  Withdrawn By Applicant Without Action  No Permit Required

18. Signature of the Director, Bureau of Alcohol, Tobacco, Firearms and Explosives <i>[Signature]</i>	19. Date 04/11/2022
--	------------------------

Defense Articles (Continued)

Permit Number [REDACTED]

Internal Control Number [REDACTED]

Name and Address of Manufacturer City and State or City and Country	Description  b	Caliber or Gauge or Size  c	Quantity (Each type)  d	Unit Cost (U.S. Currency)  e	US Munitions Import List Category  f
[REDACTED]	PRODUCT TYPE is FIREARM PARTS : FR-18 80% LOWER FRAME		Requested: 1, Granted: 1	13	I(a)
[REDACTED]	PRODUCT TYPE is FIREARM PARTS : FR-9 80% LOWER FRAME		Requested: 1, Granted: 1	13	I(a)
[REDACTED]	PRODUCT TYPE is FIREARM PARTS : FR-40 80% LOWER FRAME		Requested: 1, Granted: 1	13	I(a)
[REDACTED]	PRODUCT TYPE is FIREARM PARTS : FR-45 80% LOWER FRAME		Requested: 1, Granted: 1	13	I(a)
[REDACTED]	PRODUCT TYPE is FIREARM PARTS : FR-10 80% LOWER FRAME		Requested: 1, Granted: 1	13	I(a)
[REDACTED]	PRODUCT TYPE is FIREARM PARTS : FR-47 80% LOWER FRAME		Requested: 1, Granted: 1	13	I(a)
[REDACTED]	PRODUCT TYPE is FIREARM PARTS : FR-47 UPPER RECEIVER		Requested: 1, Granted: 1	13	I(a)

**U.S. Department of Justice**  
Bureau of Alcohol, Tobacco, Firearms and Explosives

Permit No. [REDACTED]  
VALID FOR 24 MONTHS AFTER  
THE DATE OF APPROVAL

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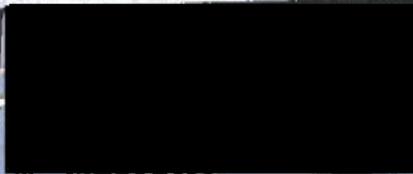
**RESTRICTIONS**

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7	CONDITIONAL IMPORTATION PER ATTACHMENT . SEE LETTER ATTACHED (CBW, FTZ., FTISB EXAMINATION ETC.)
---	--

**RECEIVED**  
JUL 05 2022  
FA70  
BY: .....



SHIP DATE: 30 JUN 22  
ACTWGT: 4.00 LB MAX  
CAD: 0886079/CAFE3513

BILL SENDER

**FIREARMS TECH INDUSTRY SERVICE BR.  
BUREAU OF ALCOHOL, TOBACCO, FIREARM & E  
244 NEEDY ROAD**

**MARTINSBURG WV 25405**

(304) 616-4300

**REF: PURCHASING MANAGER REQUEST**

FOR ADDITIONAL INFORMATION PLEASE VISIT THE FED EX WEBSITE WWW.FEDEX.COM



**FedEx**  
Express

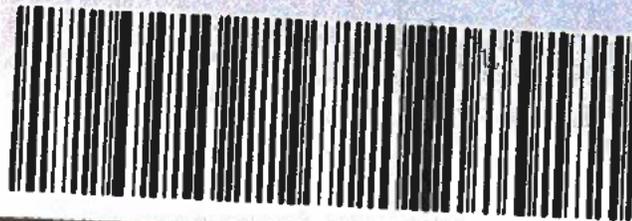


**TRK# 5648 5938 7914**  
0201

**WED - 06 JUL 4:30P  
EXPRESS SAVER**

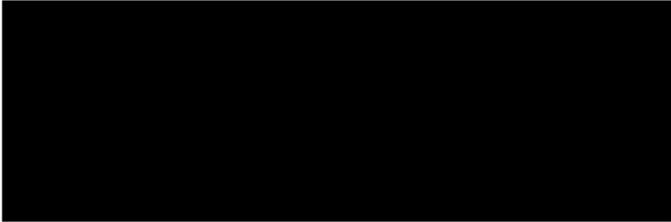
**K6 WDBA**

**25405  
WV-US IAD**



Part # 150146-434 MTW EXP 0423 \*\*\*

715



Bureau of Alcohol, Tobacco, Firearms, and Explosives  
Firearms Technology Industry Services Branch  
244 Needy Rd  
Martinsburg, WV 25405

RECEIVED  
JUL 05 2022  
FATD  
BY: .....

June 30, 2022

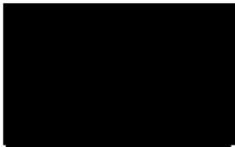
Dear FTISB Specialist:

Inside this box you will find two 80% lower receiver samples and the associated permit paperwork. One is for an FR-9, which is essentially an AR-9 with some features removed to streamline manufacturing. The other is for an FR-16, which is essentially an AR-15 again with features removed.

There isn't much else to point out about them, so I believe this evaluation will be very straightforward, but please do not hesitate to contact me at [redacted] if you have any questions.

LOWER Receivers

Thank you,



EVAL. 321-194

FR-9

EVAL. 321-196

FR-16



U.S. Department of Justice

Bureau of Alcohol, Tobacco,  
Firearms and Explosives

Firearm & Explosives Imports Branch

Martinsburg, WV

www.atf.gov

April 11, 2022

901030: CES

5330/ [REDACTED]



RECEIVED  
JUL 05 2022

BY: FA7D

Dear Applicant:

This is in response to your permit application dated April 1, 2022, to import defense articles into the United States.

The Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) was unable to determine the import status of the defense articles described on your application from the information provided. Federal regulations at Title 27 CFR 478.116 and 478.113 provide that the Director may authorize the conditional importation of a defense article for the purpose of examining and testing the defense article in order to determine the import status.

We have conditionally approved your permit application to allow you to import one each of the following models manufactured [REDACTED] FR-16, FR-9, FR-40, FR-45, FR-10 and FR-47 lower frames and one model FR-47 upper receiver to the Firearms Technology Industry Services Branch (FTISB) for an import evaluation. When submitting a firearm to ATF for examination and testing, please enclose the following documentation:

- (1) a copy of this letter and corresponding ATF Form 6 Part 1 permit;
- (2) manufacturers' information for the defense articles;
- (3) the reason(s) for testing the defense articles; and
- (4) any additional information that will assist FTISB in the examination and testing of the defense articles.

This permit is authorized under the condition that the defense articles be shipped under U. S. Customs and Border Protection supervision directly to the:

- 2 -

[REDACTED]  
Director  
Bureau of Alcohol, Tobacco, Firearms and Explosives  
Attention: Firearms Technology Industry Services Branch  
244 Needy Road  
Martinsburg, WV 25405  
(304) 616-4300

If a determination is made that the defense articles may not be imported, you have three alternatives:

- (1) destroy the defense articles;
- (2) abandon the defense articles to ATF or Customs; or
- (3) arrange for exportation of the defense articles from the United States pursuant to an export license issued by the Office of Defense Trade Controls, Department of State, if existing U.S. Government policy does not preclude the issuance of a license for such exportation.

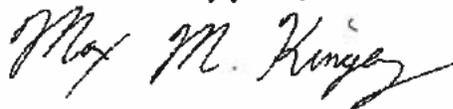
Samples may be shipped to ATF via FedEx, FedEx Ground or the United Parcel Service. All freight shipments and courier delivery shipments can only be received Monday through Thursday between 0800 and 1500 hours; or Friday 0800 to 1330. Please call the Firearms Technology Industry Services Branch at (304) 616-4300 should you need additional assistance. Do not ship any type of ordnance, explosives or hazardous materials to the Firearms Technology Industry Services Branch.

You must provide specific instructions detailing your wishes concerning the lawful disposition of the defense articles if they are determined to be non-importable. If such instructions are not received within 60 days of the notification from the Firearms Technology Industry Services Branch regarding the completion of our examination, the defense articles will be considered abandoned and will be disposed of according to the needs of the Government.

For questions related directly to the evaluation or an evaluation status check please contact the Firearms and Ammunition Technology Division at 304-616-4300 or via email at [fire\\_tech@atf.gov](mailto:fire_tech@atf.gov).

We trust that the foregoing information will be of assistance to you. Should you have further questions or concerns relative to this matter, please do not hesitate to call Examiner [REDACTED] at [REDACTED] and refer to the nine-digit permit number located in the top right hand corner of this letter.

Sincerely yours,



Max M. Kingery  
Chief, Firearms and Explosives Imports Branch

ATF Supp 000676

U.S. Department of Justice  
Bureau of Alcohol, Tobacco, Firearms and Explosives

OMB No. 1140-0005 (12/31/2022)

### Application and Permit for Importation of Firearms, Ammunition and Defense Articles

Not for use by Members of the United States Armed Forces.

<b>For ATF Use Only</b> Permit No. (Valid for 24 months from the date appearing in Item 19 below.) NPR No. [REDACTED]	<b>For Applicant's Optional Use</b> Internal Control/Reference # [REDACTED] E-mail Address (Optional) [REDACTED]
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**Section I - Application (Submit in triplicate) - For Applicant Use**

1. Federal Firearms License (If Any) License No. (x-xx-xxx-xx-xx-xxxx) [REDACTED] Expiration Date 08/01/2023	2. Telephone No. (Including Extension) [REDACTED]	3. Country of Exportation TAIWAN
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4. Name and Address of Customs Broker (Including Zip Code) [REDACTED]	5. Applicant's Name and Address (Including Zip Code) [REDACTED]
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Check here if permit is to be returned to Customs Broker.  Check here if permit is to be returned to applicant.

6. Name and Address of Foreign Seller, if any [REDACTED]	7. Name and Address of Foreign Shipper [REDACTED]
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**8. Description of Firearms and Ammunition (For firearms, enter (SG)-Shotgun; (RI)-Rifle; (PI)-Pistol; (RE)-Revolver; (DD)-Destructive Device; (MG)-Machinegun)**

	Name and Address of Manufacturer City and State or City and Country a.	Type (Pistol, Rifle, Shotgun, SG, RI, PI, RE, DD, MG) b.	Caliber Gauge or Size c.	Quantity (Each type) d.	Unit Cost (U.S. Currency) e.	U.S. Munitions Import List Category f.	Model (required) g.	Length of Barrel (Inches) h.	Overall Length (Inches) i.	Serial No. j.	New (N) or Used (U) k.
Firearms	SEE ATTACHMENT										
Defense Articles	SEE ADDITIONAL SHEETS										
Ammunition	Core Material (Lead, Steel etc.)	(Ball Wad-cutter, Shot, AP, Tracer) (Rounds)									

10. Specific Purpose of Importation, Including Final Recipient, If Known (Use additional sheets, if necessary)  
**USE IN MANUFACTURING**

11. Are You Registered as an Importer Pursuant to The Arms Export Control Act of 1976 Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	12. If "Yes," Give Importer's Registration No. and Expiration Date (A-xx-xxx-xxxx) [REDACTED]
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Under the penalties provided by law, I declare that I have examined this application, including the documents submitted in support of it, and, to the best of my knowledge and belief, it is true, correct, and complete.

13. Name of Applicant (Printed) [REDACTED]	14. Signature of Applicant DIGITALLY SIGNED	15. Title Purchasing Manager	16. Date 04/01/2022
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**Section II - For ATF Use Only (Please make no entries in this section) SEE ATTACHED PAGE FOR RESTRICTIONS**

17. The Application Has Been Examined and the Importation of the Firearms, Ammunition, and Defense Articles Described Herein is:

Approved <input type="checkbox"/>	Disapproved for the Reason Indicated Here or on Attached Letter <input type="checkbox"/>	Returned Without Action for Additional Information <input type="checkbox"/>	Conditionally Approved <input checked="" type="checkbox"/>
Partially Approved for the Reason Indicated Here or on Attached Letter <input type="checkbox"/>	Withdrawn By Applicant Without Action <input type="checkbox"/>	No Permit Required <input type="checkbox"/>	

18. Signature of the Director, Bureau of Alcohol, Tobacco, Firearms and Explosives [Signature]	19. Date 04/11/2022
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Defense Articles (Continued)

Permit Number

Internal Control Number

Name and Address of Manufacturer City and State or City and Country	Description  b	Caliber or Gauge or Size  c	Quantity (Each type)  d	Unit Cost (U.S. Currency)  e	US Munitions Import List Category  f
[REDACTED]	PRODUCT TYPE is FIREARM PARTS : FR-18 80% LOWER FRAME		Requested: 1, Granted: 1	13	I(a)
[REDACTED]	PRODUCT TYPE is FIREARM PARTS : FR-9 80% LOWER FRAME		Requested: 1, Granted: 1	13	I(a)
[REDACTED]	PRODUCT TYPE is FIREARM PARTS : FR-40 80% LOWER FRAME		Requested: 1, Granted: 1	13	I(a)
[REDACTED]	PRODUCT TYPE is FIREARM PARTS : FR-45 80% LOWER FRAME		Requested: 1, Granted: 1	13	I(a)
[REDACTED]	PRODUCT TYPE is FIREARM PARTS : FR-10 80% LOWER FRAME		Requested: 1, Granted: 1	13	I(a)
[REDACTED]	PRODUCT TYPE is FIREARM PARTS : FR-47 80% LOWER FRAME		Requested: 1, Granted: 1	13	I(a)
[REDACTED]	PRODUCT TYPE is FIREARM PARTS : FR-47 UPPER RECEIVER		Requested: 1, Granted: 1	13	I(a)

**U.S. Department of Justice**  
Bureau of Alcohol, Tobacco, Firearms and Explosives

Permit No [REDACTED]  
VALID FOR 24 MONTHS AFTER  
THE DATE OF APPROVAL

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**RESTRICTIONS**

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7	CONDITIONAL IMPORTATION PER ATTACHMENT . SEE LETTER ATTACHED (CBW, FTZ., FTISB EXAMINATION ETC.)
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**RECEIVED**  
JUL 05 2022  
FA70  
BY: .....



SHIP DATE: 30 JUN 22  
ACTWGT: 4.00 LB MAH  
CAD: 0886079/CAFE3513

BILL SENDER

**FIREARMS TECH INDUSTRY SERVICE BR.  
BUREAU OF ALCOHOL, TOBACCO, FIREARM & E  
244 NEEDY ROAD**

**MARTINSBURG WV 25405**

(304) 616-4300

**REF: PURCHASING MANAGER REQUEST**

FOR ADDITIONAL INFORMATION PLEASE VISIT THE FED EX WEBSITE WWW.FEDEX.COM



**FedEx  
Express**

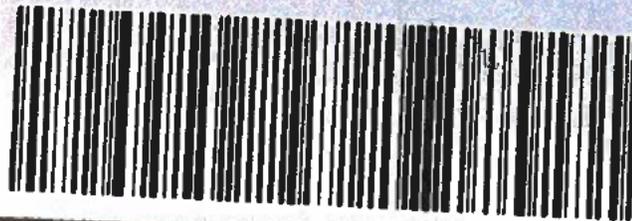


**TRK# 5648 5938 7914**  
0201

**WED - 06 JUL 4:30P  
EXPRESS SAVER**

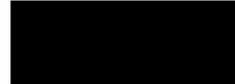
**K6 WDBA**

**25405  
WV-US IAD**



Part # 150146-434 MTW EXP 0423 \*\*\*

715



RECEIVED  
JUL 05 2022  
BY: FATO

EVAL.

6/27/2022

321-198

**NFA Branch**

Bureau of Alcohol, Tobacco, Firearms, and Explosives  
Attn: Firearms Technology Industry Services Branch  
244 Needy Road,  
Martinsburg, WV 25405  
(304) 616-4300

ONE DUMMY  
Receiver

To whom it may concern,

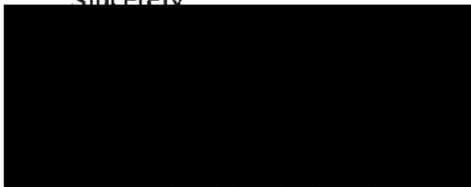
In reference to Form 6 Import Permit (Control [redacted]) and its conditionally approved letter, we are sending the enclosed dummy receiver for FTISB to further examine and testing the defense article to determine if they can be imported as explained below.

The reason for the importation of dummy receiver is for them to be used in assembling dummy non-guns for historical collector market.

Upon receiving authorization for further importation of these dummy receiver, they will not be sold individually, but rather as completed replicas.

If you have any questions or require additional information, please contact [redacted] at [redacted] or [redacted] at [redacted]

Sincerely,



International Logistics Manager

Enclosed: Form 6 (control no. [redacted]) and conditional approval letter



U.S. Department of Justice

Bureau of Alcohol, Tobacco,  
Firearms and Explosives

*Firearm & Explosives Imports Branch*

Martinsburg, WV

www.atf.gov

May 31, 2022

901030:JH

5330/

**RECEIVED**  
JUL 05 2022  
BY: *FATO*

[REDACTED]

[REDACTED]

This is in response to your permit application dated, 25 May 2022, to import (1) [REDACTED] [REDACTED] "dummy receiver for 7.62 MG" into the United States.

The Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) was unable to determine the import status of the (1) [REDACTED] "dummy receiver for 7.62 MG" described on your application from the information provided. The regulations (27 CFR 478.116) provide that the Director may authorize the conditional importation of a defense article for the purpose of examining and testing the defense article in order to determine the import status.

We have conditionally approved your permit application to allow you to import (1) [REDACTED] [REDACTED] "dummy receiver for 7.62 MG" to the Firearms Technology Industry Services Branch (FTISB) for an import evaluation. When submitting a defense article to ATF for examination and testing, please enclose the following documentation;

- (1) a copy of this letter and corresponding ATF Form 6 Part I permit;
- (2) manufacturers' information for the defense article;
- (3) the reason(s) for testing the defense article; and
- (4) any additional information that will assist FTISB in the examination and testing of the defense article.

-2-

[REDACTED]

This permit is authorized under the condition that the defense article be shipped under U. S. Customs and Border Protection supervision directly to the:

Director  
Bureau of Alcohol, Tobacco, Firearms and Explosives  
Attention: Firearms Technology Industry Services Branch  
244 Needy Road  
Martinsburg, WV 25405  
(304) 616-4300

If a determination is made that the defense article may not be imported, you have three alternatives:

- (1) destroy the defense article;
- (2) abandon the defense article to ATF or Customs; or
- (3) arrange for exportation of the defense article from the United States pursuant to an export license issued by the Office of Defense Trade Controls, Department of State, if existing U.S. Government policy does not preclude the issuance of a license for such exportation.

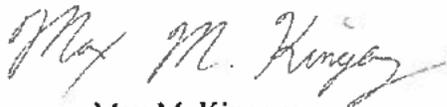
Samples may be shipped to ATF via FedEx, FedEx Ground or the United Parcel Service. All freight shipments and courier delivery shipments can only be received Monday through Thursday between 0800 and 1500 hours; or Friday 0800 to 1330. Please call the Firearms Technology Industry Services Branch at (304) 616-4300 should you need additional assistance. Do not ship any type of ordnance, explosives or hazardous materials to the Firearms Technology Industry Services Branch.

You must provide specific instructions detailing your wishes concerning the lawful disposition of the defense article. If such instructions are not received within 60 days of the notification from the Firearms Technology Industry Services Branch regarding the completion of our examination, the defense article will be considered abandoned and will be disposed of according to the needs of the Government.

For questions related directly to the evaluation or an evaluation status check please contact the Firearms and Technology Division at 304-616-4300 or via email at [fire\\_tech@atf.gov](mailto:fire_tech@atf.gov).

We trust that the foregoing information will be of assistance to you. Should you have further questions or concerns relative to this matter, please do not hesitate to call examiner [REDACTED] at [REDACTED] and refer to the nine-digit permit number located in the top right hand corner of this letter.

Sincerely yours,



Max M. Kingery

Chief, Firearms and Explosives Imports Branch

ATF Supp 000683

U.S. Department of Justice  
Bureau of Alcohol, Tobacco, Firearms and Explosives

OMB No. 1140-0005 (12/31/2022)

**Application and Permit for Importation of  
Firearms, Ammunition and Defense Articles**

Not for use by Members of the United States Armed Forces.

For ATF Use Only		For Applicant's Optional Use	
Permit No. (Valid for 24 months from the date appearing in Item 19 below.) NPR No.	Internal Control/Reference #	E-mail Address (Optional)	
	DUMMY RECEIVER		

**Section I - Application (Submit in triplicate) - For Applicant Use**

1. Federal Firearms License (If Any)		2. Telephone No. (Including Extension No.)	3. Country of Exportation
License No. (x-xx-xx-xx-xx-xxxx)	Expiration Date		TURKEY
	09/01/2022		
4. Name and Address of Customs Broker (Including Zip Code)		5. Applicant's Name and Address (Including Zip Code)	
Check here if permit is to be returned to Customs Broker. <input type="checkbox"/>		Check here if permit is to be returned to applicant <input checked="" type="checkbox"/>	
6. Name and Address of Foreign Seller, if any		7. Name and Address of Foreign Shipper	

**8. Description of Firearms and Ammunition (For firearms, enter (SG)-Shotgun; (RI)-Rifle; (PI)-Pistol; (RE)-Revolver; (DD)-Destructive Device; (MG)-Machinegun)**

Name and Address of Manufacturer City and State or City and Country	Type (Pistol, Revolver, SG, RI, PI, RE, DD, MG)	Caliber Gauge or Size	Quantity (Each type)	Unit Cost (U.S. Currency)	U.S. Muni- tions Import List Category	Model (required)	Length of Barrel (Inches)	Overall Length (Inches)	Serial No.	New (N) or Used (U)
a	b	c	d	e	f	g	h	i	j	k
Firearms <input type="checkbox"/> See Attachment										
Defense Articles <input type="checkbox"/> See Attachment			Requested: 1, Granted: 1	0	l(b)	Description PRODUCT TYPE is FIREARM PARTS : DUMMY RECEIVER FOR 7.62 MG 9. Certification of Origin. The items sought for importation in block 8: a. Do not contain parts or components produced by or for the U.S. military and do not contain parts or components manufactured with U.S. military technical data or assistance <input checked="" type="checkbox"/> b. Contain parts or components produced by or for the U.S. military or parts or components manufactured with U.S. military technical data or assistance. <input type="checkbox"/> c. Contain parts or components produced by or for the U.S. military or components manufactured with U.S. technical data or assistance that were sold abroad pursuant to a Direct Commercial Sale licensed by the Department of State. <input type="checkbox"/>				
Ammunition <input type="checkbox"/> See Attachment	Core Material (Lead, Steel etc.)	(Ball Wad-cutter, Shot, AP, Tracer) (Rounds)								

10. Specific Purpose of Importation, Including Final Recipient, If Known (Use additional sheets, if necessary)  
OTHER-SAMPLE DUMMY RECEIVER FOR R&D PURPOSES

11. Are You Registered as an Importer Pursuant to The Arms Export Control Act of 1976 Yes  No

12. If "Yes," Give Importer's Registration No. and Expiration Date (4-xx-xx-xxxx)  
[Redacted]

Under the penalties provided by law, I declare that I have examined this application, including the documents submitted in support of it, and, to the best of my knowledge and belief, it is true, correct, and complete.

13. Name of Applicant (Printed)	14. Signature of Applicant	15. Title	16. Date
[Redacted]	DIGITALLY SIGNED	INTERNATIONAL LOGISTICS MANAGE	05/25/2022

**Section II - For ATF Use Only (Please make no entries in this section) SEE ATTACHED PAGE FOR RESTRICTIONS**

17. The Application Has Been Examined and the Importation of the Firearms, Ammunition, and Defense Articles Described Herein is:

Approved  Partially Approved for the Reason Indicated Here or on Attached Letter  Disapproved for the Reason Indicated Here or on Attached Letter  Withdrawn By Applicant Without Action  Returned Without Action for Additional Information  No Permit Required  Conditionally Approved

18. Signature of the Director, Bureau of Alcohol, Tobacco, Firearms and Explosives  
*[Signature]*

19. Date  
05/31/2022

ATF Supp 000684

**U.S. Department of Justice**  
Bureau of Alcohol, Tobacco, Firearms and Explosives

Permit No: [REDACTED]  
VALID FOR 24 MONTHS AFTER  
THE DATE OF APPROVAL

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**RESTRICTIONS**

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7	CONDITIONAL IMPORTATION PER ATTACHMENT. SEE LETTER ATTACHED (CBW, FTZ., FTISB EXAMINATION ETC.)
15	BUREAU OF ALCOHOL, TOBACCO, FIREARMS AND EXPLOSIVES - DEPARTMENT OF JUSTICE
19	NOTE: THIS IS TO CERTIFY THAT THIS IS A TRUE ATTACHMENT SHEET FOR THIS PERMIT.

RECEIVED  
JUL 05 2022  
BY: KATD

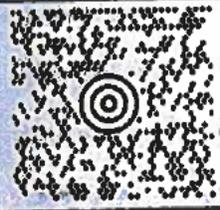


15 LBS

1 OF 1

SHIP TO:

FIREARMS TECH. IND. SERVICES BRANCH  
(775) 343-1320  
BUREAU OF ALCOHOL, TOBACCO, FIREARM  
244 NEEDY ROAD  
**MARTINSBURG WV 25405**

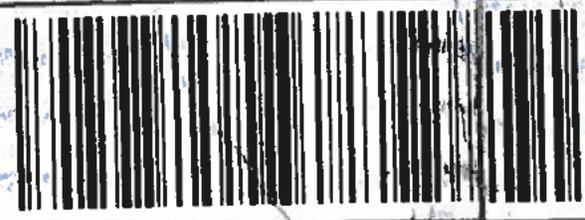


**MD 217 9-10**



**UPS GROUND**

TRACKING #: 1Z 7AT 464 03 7423 4003

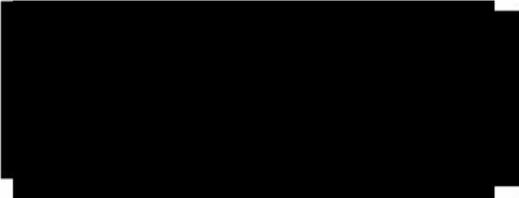


BILLING P/P

715

REF 1 sales

UP 22 0 00110 LabelW 27 0A 06/2022



July 14, 2022

**RECEIVED**  
EVAL. JUL 18 2022

Bureau of Alcohol, Tobacco, Firearms, and Explosives  
Earl Griffith, Chief  
Firearms & Ammunition Technology Division  
244 Needy Road  
Martinsburg, WV 25405

321-400	SAMPLE	1
321-402	SAMPLE	2
321-404	SAMPLE	3
321-406	SAMPLE	4

Re: Request for Classification of Partially Complete Lowers

Dear Mr. Griffith:

FOUR AR-15 LOWERS

[Redacted] is a federally licensed manufacturer of firearms. I am submitting a request for a firearm determination based on the Gun Control Act of 1968 (GCA). Included with this correspondence are samples of the same item but in different stages of production that we intend to produce and sell as a Type 07 Licensee. We will sell this item as a stand-alone item (no accompanying instructions, tools, jigs, and/or parts kits) to both end consumers (non-licensees) and federally licensed distributors.

Please advise at your earliest convenience a determination of the classification of each of the included samples that have been completed at various levels. These items have not previously been classified as frames or receivers. Pursuant to 27 C.F.R. § 478.92(c) (effective August 24, 2022), I write to request a determination (classification) that these items are still not considered to be receivers/firearms pursuant to the Final Rule Definition of "Frame or Receiver" and Identification of Firearms published in the Federal Register on April 26, 2022, and scheduled to go into effect on August 24, 2022 ("Final Rule").

**SAMPLE #1**  
**MACHINING OPERATIONS COMPLETED**

- Grip Flat Machined to Specification
- Grip Bolt Hole drilled and tapped
- Safety detent hole drilled
- Trigger Guard Mounting machined and both mount holes drilled
- Front Pivot Pin machined, and hole drilled
- Front Pivot Pin detent hole drilled
- Rear Takedown Pin hole drilled, and cavity machined
- Rear Takedown Pin Detent hole drilled

**Request for Classification**

**July 14, 2022**

**Page 2**

- Buffer Tube Hole machined and tapped
- End Plate hole machined
- Magazine Release Button hole machined
- Magazine Catch cavity machined and drilled
- Bolt Catch cavity machined and pin hole drilled
- Magwell cavity machined and broached

**MACHINING OPERATIONS REMAINING** – all additional operations must be completed to within +/- .003” tolerance for successful operation of the finished component.

- Safety Lever Hole needs to be indexed to the correct dimensions and drilled straight and to depth based off the datum point
- Trigger Pin Hole needs to be indexed to the correct dimensions and drilled straight and to depth based off the datum point
- Hammer Pin Hole needs to be indexed to the correct dimensions and drilled straight and to depth based off the datum point
- Fire Control Group cavity needs to be indexed correctly in both axis directions and machined to remove all material necessary and to correct depth to allow for operation.
- Trigger Opening needs to be indexed correctly in both axis directions and machined

**Requirements for completing operations for Sample #1**

Completion requires specialized knowledge of the required specifications of the component for proper placement of the remaining operations. Special tooling and equipment are required to complete the operations required for the receiver to be operable and the cost associated to complete these operations is in excess of \$800. Tooling requirements are correctly sized drills and end mills capable of removing material and providing a finished surface. Fixturing required needs to be able to hold the part stationary allowing no movement or deflection, otherwise necessary tolerances cannot be maintained. Measurement tools including calipers and depth gauges will also be required. Machinery required will need to be high rpm and non-moving with the ability to provide controlled machining capabilities. Estimated completion time without jig and instructions 1 to 2 hours.

The additional tooling, jigs, parts kits and instructions are NOT available for purchase from [REDACTED] by end users.

**SAMPLE #2**

**MACHINING OPERATIONS COMPLETED**

- Grip Flat Machined to Specification
- Grip Bolt Hole drilled and tapped
- Safety detent hole drilled
- Trigger Guard Mounting machined and both mount holes drilled
- Front Pivot Pin machined, and hole drilled

**Request for Classification**

**July 14, 2022**

**Page 3**

- Front Pivot Pin detent hole drilled
- Rear Takedown Pin hole drilled
- Rear Takedown Pin Detent hole drilled
- Buffer Tube Hole machined and tapped
- End Plate hole machined
- Magazine Release Buttonhole machined
- Magazine Catch cavity machined and drilled
- Bolt Catch cavity machined and pin hole drilled
- Magwell cavity machined and broached

**MACHINING OPERATIONS REMAINING** – all operations must be completed to within +/- .003” in order for successful operation of the finished component.

- Safety Lever Hole needs to be indexed to the correct dimensions and drilled straight and to depth based off the datum point
- Trigger Pin Hole needs to be indexed to the correct dimensions and drilled straight and to depth based off the datum point
- Hammer Pin Hole needs to be indexed to the correct dimensions and drilled straight and to depth based off the datum point
- Fire Control Group cavity needs to be indexed correctly in both axis directions and machined to remove all material necessary and to correct depth to allow for operation.
- Trigger Opening needs to be indexed correctly in both axis directions and machined
- **Rear Takedown Pin cavity needs to be indexed correctly and machined correctly to allow alignment of the upper receiver**

**Requirements for completing operations for Sample #2**

Completion requires specialized knowledge of the required specifications of the component for proper placement of the remaining operations. Special tooling and equipment are required to complete the operations required for the receiver to be operable and the cost associated to complete these operations is in excess of \$800. Tooling requirements are correctly sized drills and end mills capable of removing material and providing a finished surface. Fixturing required needs to be able to hold the part stationary allowing no movement or deflection, otherwise necessary tolerances cannot be maintained. Measurement tools including calipers and depth gauges will also be required. Machinery required will need to be high rpm and non-moving with the ability to provide controlled machining capabilities. Estimated completion time without jig and instructions - 1.5 to 2 hours.

The additional tooling, jigs, parts kits and instructions are NOT available for purchase from [REDACTED] by end users.

***Request for Classification***

***July 14, 2022***

***Page 4***

**SAMPLE #3**

**MACHINING OPERATIONS COMPLETED**

- Grip Flat Machined to Specification
- Grip Bolt Hole drilled and tapped
- Safety detent hole drilled
- Trigger Guard Mounting machined
- Front Pivot Pin hole machined and drilled
- Front Pivot Pin detent hole drilled
- Rear Takedown Pin hole drilled
- Rear Takedown Pin Detent hole drilled
- Buffer Tube Hole machined and tapped
- End Plate hole machined
- Magazine Release Buttonhole machined
- Magazine Catch cavity machined and drilled
- Bolt Catch cavity machined and pin hole drilled
- Magwell cavity machined and broached

**MACHINING OPERATIONS REMAINING – all operations must be completed to within +/- .003” in order for successful operation of the finished component.**

- **Trigger Guard mount holes need to be indexed and drilled**
- Safety Lever Hole needs to be indexed to the correct dimensions and drilled straight and to depth based off the datum point
- Trigger Pin Hole needs to be indexed to the correct dimensions and drilled straight and to depth based off the datum point
- Hammer Pin Hole needs to be indexed to the correct dimensions and drilled straight and to depth based off the datum point
- Fire Control Group cavity needs to be indexed correctly in both axis directions and machined to remove all material necessary and to correct depth to allow for operation.
- Trigger Opening needs to be indexed correctly in both axis directions and machined
- **Rear Takedown Pin cavity needs to be indexed correctly and machined correctly to allow alignment of the upper receiver**

**Requirements for completing operations for Sample #3**

Completion requires specialized knowledge of the required specifications of the component for proper placement of the remaining operations. Special tooling and equipment are required to complete the operations required for the receiver to be operable and the cost associated to complete these operations is in excess of \$800. Tooling requirements are correctly sized drills and end mills capable of removing material and providing a finished surface. Fixturing required needs to be able to hold the part stationary allowing no movement or deflection, otherwise necessary tolerances cannot be maintained. Measurement tools including calipers and depth gauges will also be required. Machinery required will need to be high rpm and non-moving with

**Request for Classification**  
**July 14, 2022**  
**Page 5**

the ability to provide controlled machining capabilities. Estimated completion time without jig and instructions - 2 to 2.5 hours.

The additional tooling, jigs, parts kits and instructions are NOT available for purchase from [REDACTED] by end users.

**SAMPLE #4**  
**MACHINING OPERATIONS COMPLETED**

- Grip Flat Machined to Specification
- Grip Bolt Hole drilled and tapped
- Safety detent hole drilled
- Trigger Guard Mounting machined
- Front Pivot Pin machined, and pin hole drilled
- Front Pivot Pin detent hole drilled
- Rear Takedown Pin hole drilled
- Rear Takedown Pin Detent hole drilled
- Buffer Tube Hole machined and tapped
- Magazine Release Buttonhole machined
- Magazine Catch cavity machined and drilled
- Bolt Catch cavity machined and pin hole drilled
- Magwell cavity machined and broached

**MACHINING OPERATIONS REMAINING** – all operations must be completed to within +/- .003” in order for successful operation of the finished component.

- **End Plate hole needs to be indexed correctly and machined**
- **Trigger Guard mount holes need to be indexed and drilled**
- Safety Lever Hole needs to be indexed to the correct dimensions and drilled straight and to depth based off the datum point
- Trigger Pin Hole needs to be indexed to the correct dimensions and drilled straight and to depth based off the datum point
- Hammer Pin Hole needs to be indexed to the correct dimensions and drilled straight and to depth based off the datum point
- Fire Control Group cavity needs to be indexed correctly in both axis directions and machined to remove all material necessary and to correct depth to allow for operation.
- Trigger Opening needs to be indexed correctly in both axis directions and machined
- **Rear Takedown Pin cavity needs to be indexed correctly and machined to allow for accurate alignment of the upper receiver**

**Requirements for completing operations for Sample #4**

Completion requires specialized knowledge of the required specifications of the component for proper placement of the remaining operations. Special tooling and equipment are

**Request for Classification**  
**July 14, 2022**  
**Page 6**

required to complete the operations required for the receiver to be operable and the cost associated to complete these operations is in excess of \$800. Tooling requirements are correctly sized drills and end mills capable of removing material and providing a finished surface. Fixturing required needs to be able to hold the part stationary allowing no movement or deflection, otherwise necessary tolerances cannot be maintained. Measurement tools including calipers and depth gauges will also be required. Machinery required will need to be high rpm and non-moving with the ability to provide controlled machining capabilities. Estimated completion time without jig and instructions - 2.5 to 3 hours.

The additional tooling, jigs, parts kits and instructions are NOT available for purchase from [REDACTED] by end users.

Based on the above, [REDACTED] believes that the items in each of the submitted conditions are not considered to be receivers/firearms as defined by 27 C.F.R. § 478.12(c) in the condition in which they will be sold and distributed by [REDACTED]

In order to ensure compliance with the Final Rule, [REDACTED] respectfully requests that the ATF issue a formal determination letter regarding whether these items are considered to be receivers/firearms in the partially finished condition in which they will be sold and distributed by [REDACTED]. A prepaid return shipping label with tracking is also enclosed to return the items to [REDACTED] at the conclusion of ATF's evaluation.

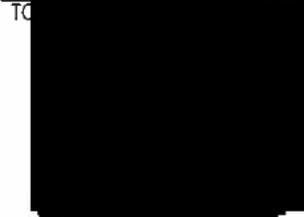
Pursuant to 28 U.S.C. § 1746(2) I declare under penalty of perjury that the foregoing is true and correct.

[REDACTED]  
Owner

Enclosures

FROM: (306) 616-4300  
EARL GRIFFITH, CHIEF  
ATF - FIREARMS & AMMO TECH DIVISION  
244 NEEDEY ROAD  
MARTINSBURG WV 25405  
US

CAD: 112547560INNET4490  
DIMMED: 11 X 10 X 3 IN



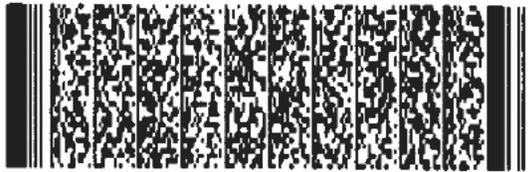
(US) 58127092/FE4A

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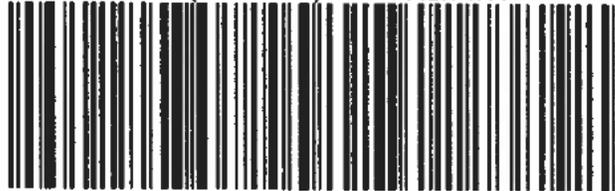


RETURN

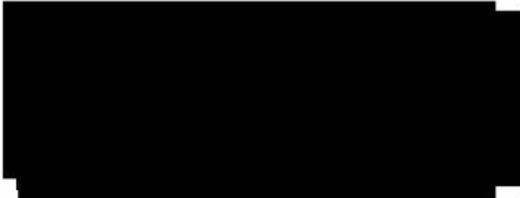
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77301

9632 0137 6 (000 000 0000) 0 00 7774 0207 6774







July 14, 2022

**RECEIVED**  
JUL 18 2022  
EVAL.

Bureau of Alcohol, Tobacco, Firearms, and Explosives  
Earl Griffith, Chief  
Firearms & Ammunition Technology Division  
244 Needy Road  
Martinsburg, WV 25405

321-400	SAMPLE	1
321-402	SAMPLE	2
321-404	SAMPLE	3
321-406	SAMPLE	4

Re: Request for Classification of Partially Complete Lowers

Dear Mr. Griffith:

FOUR AR-15 LOWERS

[Redacted] is a federally licensed manufacturer of firearms. I am submitting a request for a firearm determination based on the Gun Control Act of 1968 (GCA). Included with this correspondence are samples of the same item but in different stages of production that we intend to produce and sell as a Type 07 Licensee. We will sell this item as a stand-alone item (no accompanying instructions, tools, jigs, and/or parts kits) to both end consumers (non-licensees) and federally licensed distributors.

Please advise at your earliest convenience a determination of the classification of each of the included samples that have been completed at various levels. These items have not previously been classified as frames or receivers. Pursuant to 27 C.F.R. § 478.92(c) (effective August 24, 2022), I write to request a determination (classification) that these items are still not considered to be receivers/firearms pursuant to the Final Rule Definition of "Frame or Receiver" and Identification of Firearms published in the Federal Register on April 26, 2022, and scheduled to go into effect on August 24, 2022 ("Final Rule").

**SAMPLE #1**  
**MACHINING OPERATIONS COMPLETED**

- Grip Flat Machined to Specification
- Grip Bolt Hole drilled and tapped
- Safety detent hole drilled
- Trigger Guard Mounting machined and both mount holes drilled
- Front Pivot Pin machined, and hole drilled
- Front Pivot Pin detent hole drilled
- Rear Takedown Pin hole drilled, and cavity machined
- Rear Takedown Pin Detent hole drilled

**Request for Classification**

**July 14, 2022**

**Page 2**

- Buffer Tube Hole machined and tapped
- End Plate hole machined
- Magazine Release Button hole machined
- Magazine Catch cavity machined and drilled
- Bolt Catch cavity machined and pin hole drilled
- Magwell cavity machined and broached

**MACHINING OPERATIONS REMAINING** – all additional operations must be completed to within +/- .003” tolerance for successful operation of the finished component.

- Safety Lever Hole needs to be indexed to the correct dimensions and drilled straight and to depth based off the datum point
- Trigger Pin Hole needs to be indexed to the correct dimensions and drilled straight and to depth based off the datum point
- Hammer Pin Hole needs to be indexed to the correct dimensions and drilled straight and to depth based off the datum point
- Fire Control Group cavity needs to be indexed correctly in both axis directions and machined to remove all material necessary and to correct depth to allow for operation.
- Trigger Opening needs to be indexed correctly in both axis directions and machined

**Requirements for completing operations for Sample #1**

Completion requires specialized knowledge of the required specifications of the component for proper placement of the remaining operations. Special tooling and equipment are required to complete the operations required for the receiver to be operable and the cost associated to complete these operations is in excess of \$800. Tooling requirements are correctly sized drills and end mills capable of removing material and providing a finished surface. Fixturing required needs to be able to hold the part stationary allowing no movement or deflection, otherwise necessary tolerances cannot be maintained. Measurement tools including calipers and depth gauges will also be required. Machinery required will need to be high rpm and non-moving with the ability to provide controlled machining capabilities. Estimated completion time without jig and instructions 1 to 2 hours.

The additional tooling, jigs, parts kits and instructions are NOT available for purchase from [REDACTED] by end users.

**SAMPLE #2**

**MACHINING OPERATIONS COMPLETED**

- Grip Flat Machined to Specification
- Grip Bolt Hole drilled and tapped
- Safety detent hole drilled
- Trigger Guard Mounting machined and both mount holes drilled
- Front Pivot Pin machined, and hole drilled

**Request for Classification**

**July 14, 2022**

**Page 3**

- Front Pivot Pin detent hole drilled
- Rear Takedown Pin hole drilled
- Rear Takedown Pin Detent hole drilled
- Buffer Tube Hole machined and tapped
- End Plate hole machined
- Magazine Release Buttonhole machined
- Magazine Catch cavity machined and drilled
- Bolt Catch cavity machined and pin hole drilled
- Magwell cavity machined and broached

**MACHINING OPERATIONS REMAINING** – all operations must be completed to within +/- .003” in order for successful operation of the finished component.

- Safety Lever Hole needs to be indexed to the correct dimensions and drilled straight and to depth based off the datum point
- Trigger Pin Hole needs to be indexed to the correct dimensions and drilled straight and to depth based off the datum point
- Hammer Pin Hole needs to be indexed to the correct dimensions and drilled straight and to depth based off the datum point
- Fire Control Group cavity needs to be indexed correctly in both axis directions and machined to remove all material necessary and to correct depth to allow for operation.
- Trigger Opening needs to be indexed correctly in both axis directions and machined
- **Rear Takedown Pin cavity needs to be indexed correctly and machined correctly to allow alignment of the upper receiver**

**Requirements for completing operations for Sample #2**

Completion requires specialized knowledge of the required specifications of the component for proper placement of the remaining operations. Special tooling and equipment are required to complete the operations required for the receiver to be operable and the cost associated to complete these operations is in excess of \$800. Tooling requirements are correctly sized drills and end mills capable of removing material and providing a finished surface. Fixturing required needs to be able to hold the part stationary allowing no movement or deflection, otherwise necessary tolerances cannot be maintained. Measurement tools including calipers and depth gauges will also be required. Machinery required will need to be high rpm and non-moving with the ability to provide controlled machining capabilities. Estimated completion time without jig and instructions - 1.5 to 2 hours.

The additional tooling, jigs, parts kits and instructions are NOT available for purchase from [REDACTED] end users.

***Request for Classification***

***July 14, 2022***

***Page 4***

**SAMPLE #3**

**MACHINING OPERATIONS COMPLETED**

- Grip Flat Machined to Specification
- Grip Bolt Hole drilled and tapped
- Safety detent hole drilled
- Trigger Guard Mounting machined
- Front Pivot Pin hole machined and drilled
- Front Pivot Pin detent hole drilled
- Rear Takedown Pin hole drilled
- Rear Takedown Pin Detent hole drilled
- Buffer Tube Hole machined and tapped
- End Plate hole machined
- Magazine Release Buttonhole machined
- Magazine Catch cavity machined and drilled
- Bolt Catch cavity machined and pin hole drilled
- Magwell cavity machined and broached

**MACHINING OPERATIONS REMAINING – all operations must be completed to within +/- .003” in order for successful operation of the finished component.**

- **Trigger Guard mount holes need to be indexed and drilled**
- Safety Lever Hole needs to be indexed to the correct dimensions and drilled straight and to depth based off the datum point
- Trigger Pin Hole needs to be indexed to the correct dimensions and drilled straight and to depth based off the datum point
- Hammer Pin Hole needs to be indexed to the correct dimensions and drilled straight and to depth based off the datum point
- Fire Control Group cavity needs to be indexed correctly in both axis directions and machined to remove all material necessary and to correct depth to allow for operation.
- Trigger Opening needs to be indexed correctly in both axis directions and machined
- **Rear Takedown Pin cavity needs to be indexed correctly and machined correctly to allow alignment of the upper receiver**

**Requirements for completing operations for Sample #3**

Completion requires specialized knowledge of the required specifications of the component for proper placement of the remaining operations. Special tooling and equipment are required to complete the operations required for the receiver to be operable and the cost associated to complete these operations is in excess of \$800. Tooling requirements are correctly sized drills and end mills capable of removing material and providing a finished surface. Fixturing required needs to be able to hold the part stationary allowing no movement or deflection, otherwise necessary tolerances cannot be maintained. Measurement tools including calipers and depth gauges will also be required. Machinery required will need to be high rpm and non-moving with

**Request for Classification**

**July 14, 2022**

**Page 5**

the ability to provide controlled machining capabilities. Estimated completion time without jig and instructions - 2 to 2.5 hours.

The additional tooling, jigs, parts kits and instructions are NOT available for purchase from [REDACTED] by end users.

**SAMPLE #4**

**MACHINING OPERATIONS COMPLETED**

- Grip Flat Machined to Specification
- Grip Bolt Hole drilled and tapped
- Safety detent hole drilled
- Trigger Guard Mounting machined
- Front Pivot Pin machined, and pin hole drilled
- Front Pivot Pin detent hole drilled
- Rear Takedown Pin hole drilled
- Rear Takedown Pin Detent hole drilled
- Buffer Tube Hole machined and tapped
- Magazine Release Buttonhole machined
- Magazine Catch cavity machined and drilled
- Bolt Catch cavity machined and pin hole drilled
- Magwell cavity machined and broached

**MACHINING OPERATIONS REMAINING** – all operations must be completed to within +/- .003” in order for successful operation of the finished component.

- **End Plate hole needs to be indexed correctly and machined**
- **Trigger Guard mount holes need to be indexed and drilled**
- Safety Lever Hole needs to be indexed to the correct dimensions and drilled straight and to depth based off the datum point
- Trigger Pin Hole needs to be indexed to the correct dimensions and drilled straight and to depth based off the datum point
- Hammer Pin Hole needs to be indexed to the correct dimensions and drilled straight and to depth based off the datum point
- Fire Control Group cavity needs to be indexed correctly in both axis directions and machined to remove all material necessary and to correct depth to allow for operation.
- Trigger Opening needs to be indexed correctly in both axis directions and machined
- **Rear Takedown Pin cavity needs to be indexed correctly and machined to allow for accurate alignment of the upper receiver**

**Requirements for completing operations for Sample #4**

Completion requires specialized knowledge of the required specifications of the component for proper placement of the remaining operations. Special tooling and equipment are

**Request for Classification**

**July 14, 2022**

**Page 6**

required to complete the operations required for the receiver to be operable and the cost associated to complete these operations is in excess of \$800. Tooling requirements are correctly sized drills and end mills capable of removing material and providing a finished surface. Fixturing required needs to be able to hold the part stationary allowing no movement or deflection, otherwise necessary tolerances cannot be maintained. Measurement tools including calipers and depth gauges will also be required. Machinery required will need to be high rpm and non-moving with the ability to provide controlled machining capabilities. Estimated completion time without jig and instructions - 2.5 to 3 hours.

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Based on the above, [REDACTED] believes that the items in each of the submitted conditions are not considered to be receivers/firearms as defined by 27 C.F.R. § 478.12(c) in the condition in which they will be sold and distributed by [REDACTED]

In order to ensure compliance with the Final Rule, [REDACTED] respectfully requests that the ATF issue a formal determination letter regarding whether these items are considered to be receivers/firearms in the partially finished condition in which they will be sold and distributed by [REDACTED]. A prepaid return shipping label with tracking is also enclosed to return the items to [REDACTED] at the conclusion of ATF's evaluation.

Pursuant to 28 U.S.C. § 1746(2) I declare under penalty of perjury that the foregoing is true and correct.

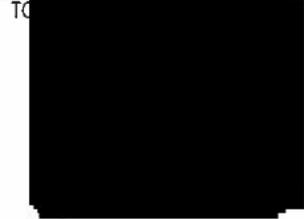
[REDACTED]

Owner

Enclosures

FROM: (306) 616-4300  
EARL GRIFFITH, CHIEF  
ATF - FIREARMS & AMMO TECH DIVISION  
244 NEEDEY ROAD  
MARTINSBURG WV 25405  
US

CAD: 112547560INNET4490  
DIMMED: 11 X 10 X 3 IN



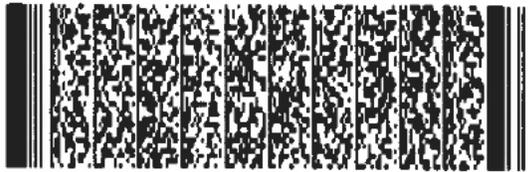
(US) 58127092/FEMA

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RETURN

TRK# 7774 0207 6774

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July 14, 2022

**RECEIVED**  
JUL 18 2022  
EVAL.

Bureau of Alcohol, Tobacco, Firearms, and Explosives  
Earl Griffith, Chief  
Firearms & Ammunition Technology Division  
244 Needy Road  
Martinsburg, WV 25405

321-400	SAMPLE	1
321-402	SAMPLE	2
321-404	SAMPLE	3
321-406	SAMPLE	4

Re: Request for Classification of Partially Complete Lowers

Dear Mr. Griffith:

FOUR AR-15 LOWERS

[REDACTED] is a federally licensed manufacturer of firearms. I am submitting a request for a firearm determination based on the Gun Control Act of 1968 (GCA). Included with this correspondence are samples of the same item but in different stages of production that we intend to produce and sell as a Type 07 Licensee. We will sell this item as a stand-alone item (no accompanying instructions, tools, jigs, and/or parts kits) to both end consumers (non-licensees) and federally licensed distributors.

Please advise at your earliest convenience a determination of the classification of each of the included samples that have been completed at various levels. These items have not previously been classified as frames or receivers. Pursuant to 27 C.F.R. § 478.92(c) (effective August 24, 2022), I write to request a determination (classification) that these items are still not considered to be receivers/firearms pursuant to the Final Rule Definition of "Frame or Receiver" and Identification of Firearms published in the Federal Register on April 26, 2022, and scheduled to go into effect on August 24, 2022 ("Final Rule").

**SAMPLE #1**  
**MACHINING OPERATIONS COMPLETED**

- Grip Flat Machined to Specification
- Grip Bolt Hole drilled and tapped
- Safety detent hole drilled
- Trigger Guard Mounting machined and both mount holes drilled
- Front Pivot Pin machined, and hole drilled
- Front Pivot Pin detent hole drilled
- Rear Takedown Pin hole drilled, and cavity machined
- Rear Takedown Pin Detent hole drilled

**Request for Classification**

**July 14, 2022**

**Page 2**

- Buffer Tube Hole machined and tapped
- End Plate hole machined
- Magazine Release Button hole machined
- Magazine Catch cavity machined and drilled
- Bolt Catch cavity machined and pin hole drilled
- Magwell cavity machined and broached

**MACHINING OPERATIONS REMAINING** – all additional operations must be completed to within +/- .003” tolerance for successful operation of the finished component.

- Safety Lever Hole needs to be indexed to the correct dimensions and drilled straight and to depth based off the datum point
- Trigger Pin Hole needs to be indexed to the correct dimensions and drilled straight and to depth based off the datum point
- Hammer Pin Hole needs to be indexed to the correct dimensions and drilled straight and to depth based off the datum point
- Fire Control Group cavity needs to be indexed correctly in both axis directions and machined to remove all material necessary and to correct depth to allow for operation.
- Trigger Opening needs to be indexed correctly in both axis directions and machined

**Requirements for completing operations for Sample #1**

Completion requires specialized knowledge of the required specifications of the component for proper placement of the remaining operations. Special tooling and equipment are required to complete the operations required for the receiver to be operable and the cost associated to complete these operations is in excess of \$800. Tooling requirements are correctly sized drills and end mills capable of removing material and providing a finished surface. Fixturing required needs to be able to hold the part stationary allowing no movement or deflection, otherwise necessary tolerances cannot be maintained. Measurement tools including calipers and depth gauges will also be required. Machinery required will need to be high rpm and non-moving with the ability to provide controlled machining capabilities. Estimated completion time without jig and instructions 1 to 2 hours.

The additional tooling, jigs, parts kits and instructions are NOT available for purchase from [REDACTED] by end users.

**SAMPLE #2**

**MACHINING OPERATIONS COMPLETED**

- Grip Flat Machined to Specification
- Grip Bolt Hole drilled and tapped
- Safety detent hole drilled
- Trigger Guard Mounting machined and both mount holes drilled
- Front Pivot Pin machined, and hole drilled

**Request for Classification**

**July 14, 2022**

**Page 3**

- Front Pivot Pin detent hole drilled
- Rear Takedown Pin hole drilled
- Rear Takedown Pin Detent hole drilled
- Buffer Tube Hole machined and tapped
- End Plate hole machined
- Magazine Release Buttonhole machined
- Magazine Catch cavity machined and drilled
- Bolt Catch cavity machined and pin hole drilled
- Magwell cavity machined and broached

**MACHINING OPERATIONS REMAINING** – all operations must be completed to within +/- .003” in order for successful operation of the finished component.

- Safety Lever Hole needs to be indexed to the correct dimensions and drilled straight and to depth based off the datum point
- Trigger Pin Hole needs to be indexed to the correct dimensions and drilled straight and to depth based off the datum point
- Hammer Pin Hole needs to be indexed to the correct dimensions and drilled straight and to depth based off the datum point
- Fire Control Group cavity needs to be indexed correctly in both axis directions and machined to remove all material necessary and to correct depth to allow for operation.
- Trigger Opening needs to be indexed correctly in both axis directions and machined
- **Rear Takedown Pin cavity needs to be indexed correctly and machined correctly to allow alignment of the upper receiver**

**Requirements for completing operations for Sample #2**

Completion requires specialized knowledge of the required specifications of the component for proper placement of the remaining operations. Special tooling and equipment are required to complete the operations required for the receiver to be operable and the cost associated to complete these operations is in excess of \$800. Tooling requirements are correctly sized drills and end mills capable of removing material and providing a finished surface. Fixturing required needs to be able to hold the part stationary allowing no movement or deflection, otherwise necessary tolerances cannot be maintained. Measurement tools including calipers and depth gauges will also be required. Machinery required will need to be high rpm and non-moving with the ability to provide controlled machining capabilities. Estimated completion time without jig and instructions - 1.5 to 2 hours.

The additional tooling, jigs, parts kits and instructions are NOT available for purchase from [REDACTED] end users.

*Request for Classification*

*July 14, 2022*

*Page 4*

**SAMPLE #3**

**MACHINING OPERATIONS COMPLETED**

- Grip Flat Machined to Specification
- Grip Bolt Hole drilled and tapped
- Safety detent hole drilled
- Trigger Guard Mounting machined
- Front Pivot Pin hole machined and drilled
- Front Pivot Pin detent hole drilled
- Rear Takedown Pin hole drilled
- Rear Takedown Pin Detent hole drilled
- Buffer Tube Hole machined and tapped
- End Plate hole machined
- Magazine Release Buttonhole machined
- Magazine Catch cavity machined and drilled
- Bolt Catch cavity machined and pin hole drilled
- Magwell cavity machined and broached

**MACHINING OPERATIONS REMAINING** – all operations must be completed to within +/- .003” in order for successful operation of the finished component.

- **Trigger Guard mount holes need to be indexed and drilled**
- Safety Lever Hole needs to be indexed to the correct dimensions and drilled straight and to depth based off the datum point
- Trigger Pin Hole needs to be indexed to the correct dimensions and drilled straight and to depth based off the datum point
- Hammer Pin Hole needs to be indexed to the correct dimensions and drilled straight and to depth based off the datum point
- Fire Control Group cavity needs to be indexed correctly in both axis directions and machined to remove all material necessary and to correct depth to allow for operation.
- Trigger Opening needs to be indexed correctly in both axis directions and machined
- **Rear Takedown Pin cavity needs to be indexed correctly and machined correctly to allow alignment of the upper receiver**

**Requirements for completing operations for Sample #3**

Completion requires specialized knowledge of the required specifications of the component for proper placement of the remaining operations. Special tooling and equipment are required to complete the operations required for the receiver to be operable and the cost associated to complete these operations is in excess of \$800. Tooling requirements are correctly sized drills and end mills capable of removing material and providing a finished surface. Fixturing required needs to be able to hold the part stationary allowing no movement or deflection, otherwise necessary tolerances cannot be maintained. Measurement tools including calipers and depth gauges will also be required. Machinery required will need to be high rpm and non-moving with

**Request for Classification**  
**July 14, 2022**  
**Page 5**

the ability to provide controlled machining capabilities. Estimated completion time without jig and instructions - 2 to 2.5 hours.

The additional tooling, jigs, parts kits and instructions are NOT available for purchase from [REDACTED] by end users.

**SAMPLE #4**  
**MACHINING OPERATIONS COMPLETED**

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- Grip Bolt Hole drilled and tapped
- Safety detent hole drilled
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- Front Pivot Pin machined, and pin hole drilled
- Front Pivot Pin detent hole drilled
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- Rear Takedown Pin Detent hole drilled
- Buffer Tube Hole machined and tapped
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- Bolt Catch cavity machined and pin hole drilled
- Magwell cavity machined and broached

**MACHINING OPERATIONS REMAINING** – all operations must be completed to within +/- .003” in order for successful operation of the finished component.

- **End Plate hole needs to be indexed correctly and machined**
- **Trigger Guard mount holes need to be indexed and drilled**
- Safety Lever Hole needs to be indexed to the correct dimensions and drilled straight and to depth based off the datum point
- Trigger Pin Hole needs to be indexed to the correct dimensions and drilled straight and to depth based off the datum point
- Hammer Pin Hole needs to be indexed to the correct dimensions and drilled straight and to depth based off the datum point
- Fire Control Group cavity needs to be indexed correctly in both axis directions and machined to remove all material necessary and to correct depth to allow for operation.
- Trigger Opening needs to be indexed correctly in both axis directions and machined
- **Rear Takedown Pin cavity needs to be indexed correctly and machined to allow for accurate alignment of the upper receiver**

**Requirements for completing operations for Sample #4**

Completion requires specialized knowledge of the required specifications of the component for proper placement of the remaining operations. Special tooling and equipment are

**Request for Classification**

**July 14, 2022**

**Page 6**

required to complete the operations required for the receiver to be operable and the cost associated to complete these operations is in excess of \$800. Tooling requirements are correctly sized drills and end mills capable of removing material and providing a finished surface. Fixturing required needs to be able to hold the part stationary allowing no movement or deflection, otherwise necessary tolerances cannot be maintained. Measurement tools including calipers and depth gauges will also be required. Machinery required will need to be high rpm and non-moving with the ability to provide controlled machining capabilities. Estimated completion time without jig and instructions - 2.5 to 3 hours.

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In order to ensure compliance with the Final Rule, [REDACTED] respectfully requests that the ATF issue a formal determination letter regarding whether these items are considered to be receivers/firearms in the partially finished condition in which they will be sold and distributed by [REDACTED]. A prepaid return shipping label with tracking is also enclosed to return the items to [REDACTED] at the conclusion of ATF's evaluation.

Pursuant to 28 U.S.C. § 1746(2) I declare under penalty of perjury that the foregoing is true and correct.

[REDACTED]  
Owner

Enclosures

FROM: (306) 616-4300  
EARL GRIFFITH, CHIEF  
ATF - FIREARMS & AMMO TECH DIVISION  
244 NEEDEY ROAD  
MARTINSBURG WV 25405  
US

CAD: 112547560INNET4490  
DIMMED: 11 X 10 X 3 IN

TO  
[Redacted]

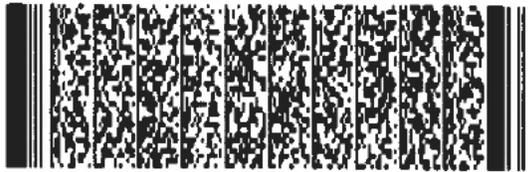
(US) 58127092/FEMA

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DEPT:

RMA:



FedEx  
Ground



TRK# 7774 0207 6774

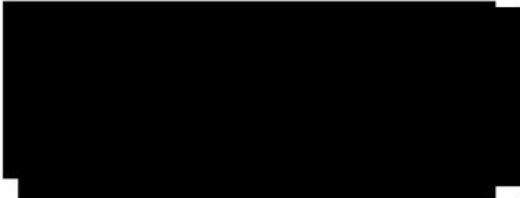
RETURN

77301

9632 0137 6 (000 000 0000) 0 00 7774 0207 6774







July 14, 2022

**RECEIVED**  
EVAL. JUL 18 2022

Bureau of Alcohol, Tobacco, Firearms, and Explosives  
Earl Griffith, Chief  
Firearms & Ammunition Technology Division  
244 Needy Road  
Martinsburg, WV 25405

321-400	SAMPLE	1
321-402	SAMPLE	2
321-404	SAMPLE	3
321-406	SAMPLE	4

Re: Request for Classification of Partially Complete Lowers

Dear Mr. Griffith:

FOUR AR-15 LOWERS

[Redacted] is a federally licensed manufacturer of firearms. I am submitting a request for a firearm determination based on the Gun Control Act of 1968 (GCA). Included with this correspondence are samples of the same item but in different stages of production that we intend to produce and sell as a Type 07 Licensee. We will sell this item as a stand-alone item (no accompanying instructions, tools, jigs, and/or parts kits) to both end consumers (non-licensees) and federally licensed distributors.

Please advise at your earliest convenience a determination of the classification of each of the included samples that have been completed at various levels. These items have not previously been classified as frames or receivers. Pursuant to 27 C.F.R. § 478.92(c) (effective August 24, 2022), I write to request a determination (classification) that these items are still not considered to be receivers/firearms pursuant to the Final Rule Definition of "Frame or Receiver" and Identification of Firearms published in the Federal Register on April 26, 2022, and scheduled to go into effect on August 24, 2022 ("Final Rule").

**SAMPLE #1**  
**MACHINING OPERATIONS COMPLETED**

- Grip Flat Machined to Specification
- Grip Bolt Hole drilled and tapped
- Safety detent hole drilled
- Trigger Guard Mounting machined and both mount holes drilled
- Front Pivot Pin machined, and hole drilled
- Front Pivot Pin detent hole drilled
- Rear Takedown Pin hole drilled, and cavity machined
- Rear Takedown Pin Detent hole drilled

**Request for Classification**

**July 14, 2022**

**Page 2**

- Buffer Tube Hole machined and tapped
- End Plate hole machined
- Magazine Release Button hole machined
- Magazine Catch cavity machined and drilled
- Bolt Catch cavity machined and pin hole drilled
- Magwell cavity machined and broached

**MACHINING OPERATIONS REMAINING** – all additional operations must be completed to within +/- .003” tolerance for successful operation of the finished component.

- Safety Lever Hole needs to be indexed to the correct dimensions and drilled straight and to depth based off the datum point
- Trigger Pin Hole needs to be indexed to the correct dimensions and drilled straight and to depth based off the datum point
- Hammer Pin Hole needs to be indexed to the correct dimensions and drilled straight and to depth based off the datum point
- Fire Control Group cavity needs to be indexed correctly in both axis directions and machined to remove all material necessary and to correct depth to allow for operation.
- Trigger Opening needs to be indexed correctly in both axis directions and machined

**Requirements for completing operations for Sample #1**

Completion requires specialized knowledge of the required specifications of the component for proper placement of the remaining operations. Special tooling and equipment are required to complete the operations required for the receiver to be operable and the cost associated to complete these operations is in excess of \$800. Tooling requirements are correctly sized drills and end mills capable of removing material and providing a finished surface. Fixturing required needs to be able to hold the part stationary allowing no movement or deflection, otherwise necessary tolerances cannot be maintained. Measurement tools including calipers and depth gauges will also be required. Machinery required will need to be high rpm and non-moving with the ability to provide controlled machining capabilities. Estimated completion time without jig and instructions 1 to 2 hours.

The additional tooling, jigs, parts kits and instructions are NOT available for purchase from [REDACTED] by end users.

**SAMPLE #2**

**MACHINING OPERATIONS COMPLETED**

- Grip Flat Machined to Specification
- Grip Bolt Hole drilled and tapped
- Safety detent hole drilled
- Trigger Guard Mounting machined and both mount holes drilled
- Front Pivot Pin machined, and hole drilled

**Request for Classification**

**July 14, 2022**

**Page 3**

- Front Pivot Pin detent hole drilled
- Rear Takedown Pin hole drilled
- Rear Takedown Pin Detent hole drilled
- Buffer Tube Hole machined and tapped
- End Plate hole machined
- Magazine Release Buttonhole machined
- Magazine Catch cavity machined and drilled
- Bolt Catch cavity machined and pin hole drilled
- Magwell cavity machined and broached

**MACHINING OPERATIONS REMAINING** – all operations must be completed to within +/- .003” in order for successful operation of the finished component.

- Safety Lever Hole needs to be indexed to the correct dimensions and drilled straight and to depth based off the datum point
- Trigger Pin Hole needs to be indexed to the correct dimensions and drilled straight and to depth based off the datum point
- Hammer Pin Hole needs to be indexed to the correct dimensions and drilled straight and to depth based off the datum point
- Fire Control Group cavity needs to be indexed correctly in both axis directions and machined to remove all material necessary and to correct depth to allow for operation.
- Trigger Opening needs to be indexed correctly in both axis directions and machined
- **Rear Takedown Pin cavity needs to be indexed correctly and machined correctly to allow alignment of the upper receiver**

**Requirements for completing operations for Sample #2**

Completion requires specialized knowledge of the required specifications of the component for proper placement of the remaining operations. Special tooling and equipment are required to complete the operations required for the receiver to be operable and the cost associated to complete these operations is in excess of \$800. Tooling requirements are correctly sized drills and end mills capable of removing material and providing a finished surface. Fixturing required needs to be able to hold the part stationary allowing no movement or deflection, otherwise necessary tolerances cannot be maintained. Measurement tools including calipers and depth gauges will also be required. Machinery required will need to be high rpm and non-moving with the ability to provide controlled machining capabilities. Estimated completion time without jig and instructions - 1.5 to 2 hours.

The additional tooling, jigs, parts kits and instructions are NOT available for purchase from [REDACTED] by end users.

***Request for Classification***

***July 14, 2022***

***Page 4***

**SAMPLE #3**

**MACHINING OPERATIONS COMPLETED**

- Grip Flat Machined to Specification
- Grip Bolt Hole drilled and tapped
- Safety detent hole drilled
- Trigger Guard Mounting machined
- Front Pivot Pin hole machined and drilled
- Front Pivot Pin detent hole drilled
- Rear Takedown Pin hole drilled
- Rear Takedown Pin Detent hole drilled
- Buffer Tube Hole machined and tapped
- End Plate hole machined
- Magazine Release Buttonhole machined
- Magazine Catch cavity machined and drilled
- Bolt Catch cavity machined and pin hole drilled
- Magwell cavity machined and broached

**MACHINING OPERATIONS REMAINING – all operations must be completed to within +/- .003” in order for successful operation of the finished component.**

- **Trigger Guard mount holes need to be indexed and drilled**
- Safety Lever Hole needs to be indexed to the correct dimensions and drilled straight and to depth based off the datum point
- Trigger Pin Hole needs to be indexed to the correct dimensions and drilled straight and to depth based off the datum point
- Hammer Pin Hole needs to be indexed to the correct dimensions and drilled straight and to depth based off the datum point
- Fire Control Group cavity needs to be indexed correctly in both axis directions and machined to remove all material necessary and to correct depth to allow for operation.
- Trigger Opening needs to be indexed correctly in both axis directions and machined
- **Rear Takedown Pin cavity needs to be indexed correctly and machined correctly to allow alignment of the upper receiver**

**Requirements for completing operations for Sample #3**

Completion requires specialized knowledge of the required specifications of the component for proper placement of the remaining operations. Special tooling and equipment are required to complete the operations required for the receiver to be operable and the cost associated to complete these operations is in excess of \$800. Tooling requirements are correctly sized drills and end mills capable of removing material and providing a finished surface. Fixturing required needs to be able to hold the part stationary allowing no movement or deflection, otherwise necessary tolerances cannot be maintained. Measurement tools including calipers and depth gauges will also be required. Machinery required will need to be high rpm and non-moving with

**Request for Classification**

**July 14, 2022**

**Page 5**

the ability to provide controlled machining capabilities. Estimated completion time without jig and instructions - 2 to 2.5 hours.

The additional tooling, jigs, parts kits and instructions are NOT available for purchase from [REDACTED] by end users.

**SAMPLE #4**

**MACHINING OPERATIONS COMPLETED**

- Grip Flat Machined to Specification
- Grip Bolt Hole drilled and tapped
- Safety detent hole drilled
- Trigger Guard Mounting machined
- Front Pivot Pin machined, and pin hole drilled
- Front Pivot Pin detent hole drilled
- Rear Takedown Pin hole drilled
- Rear Takedown Pin Detent hole drilled
- Buffer Tube Hole machined and tapped
- Magazine Release Buttonhole machined
- Magazine Catch cavity machined and drilled
- Bolt Catch cavity machined and pin hole drilled
- Magwell cavity machined and broached

**MACHINING OPERATIONS REMAINING** – all operations must be completed to within +/- .003” in order for successful operation of the finished component.

- **End Plate hole needs to be indexed correctly and machined**
- **Trigger Guard mount holes need to be indexed and drilled**
- Safety Lever Hole needs to be indexed to the correct dimensions and drilled straight and to depth based off the datum point
- Trigger Pin Hole needs to be indexed to the correct dimensions and drilled straight and to depth based off the datum point
- Hammer Pin Hole needs to be indexed to the correct dimensions and drilled straight and to depth based off the datum point
- Fire Control Group cavity needs to be indexed correctly in both axis directions and machined to remove all material necessary and to correct depth to allow for operation.
- Trigger Opening needs to be indexed correctly in both axis directions and machined
- **Rear Takedown Pin cavity needs to be indexed correctly and machined to allow for accurate alignment of the upper receiver**

**Requirements for completing operations for Sample #4**

Completion requires specialized knowledge of the required specifications of the component for proper placement of the remaining operations. Special tooling and equipment are

**Request for Classification**

**July 14, 2022**

**Page 6**

required to complete the operations required for the receiver to be operable and the cost associated to complete these operations is in excess of \$800. Tooling requirements are correctly sized drills and end mills capable of removing material and providing a finished surface. Fixturing required needs to be able to hold the part stationary allowing no movement or deflection, otherwise necessary tolerances cannot be maintained. Measurement tools including calipers and depth gauges will also be required. Machinery required will need to be high rpm and non-moving with the ability to provide controlled machining capabilities. Estimated completion time without jig and instructions - 2.5 to 3 hours.

The additional tooling, jigs, parts kits and instructions are NOT available for purchase from [REDACTED] by end users.

Based on the above, [REDACTED] believes that the items in each of the submitted conditions are not considered to be receivers/firearms as defined by 27 C.F.R. § 478.12(c) in the condition in which they will be sold and distributed by [REDACTED]

In order to ensure compliance with the Final Rule, [REDACTED] respectfully requests that the ATF issue a formal determination letter regarding whether these items are considered to be receivers/firearms in the partially finished condition in which they will be sold and distributed by [REDACTED]. A prepaid return shipping label with tracking is also enclosed to return the items to [REDACTED] at the conclusion of ATF's evaluation.

Pursuant to 28 U.S.C. § 1746(2) I declare under penalty of perjury that the foregoing is true and correct.

[REDACTED]

Owner

Enclosures

FROM: (306) 616-4300  
EARL GRIFFITH, CHIEF  
ATF - FIREARMS & AMMO TECH DIVISION  
244 NEEDEY ROAD  
MARTINSBURG WV 25405  
US

CAD: 112547560INET4490  
DIMMED: 11 X 10 X 3 IN

TO  
[REDACTED]

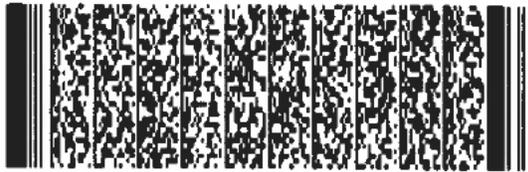
(US) 58127092/FE4

REF:

PO:

DEPT:

RMA:



**FedEx**  
Ground



1220220120 1hr

TRK# 7774 0207 6774

RETURN

77301

9632 0137 6 (000 000 0000) 0 00 7774 0207 6774







EVAL.  
321-446

RECEIVED  
JUL 19 2022

07/12/2022

ATF  
Firearms and Ammunition Technology Division  
244 Needy Road  
Suite 1600  
Martinsburg, West Virginia 25405

ONE  
AR-15 TYPE Receiver

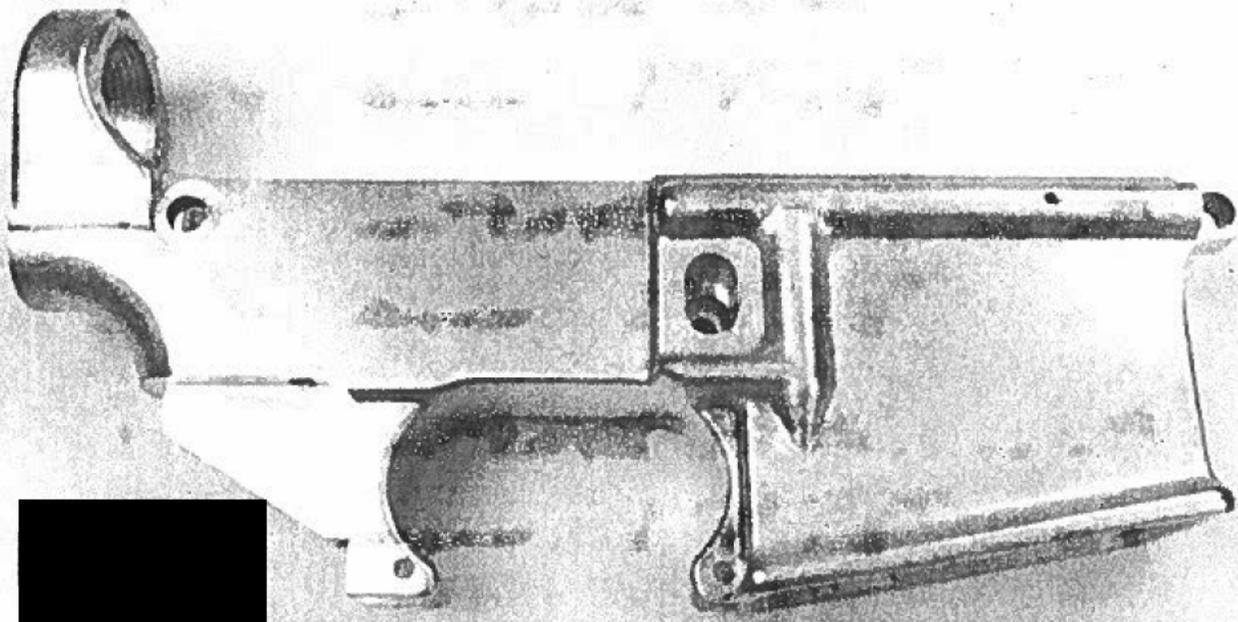
To Whom It May Concern:

We are submitting the enclosed item for classification under the Gun Control Act of 1968 (GCA).

The item is pictured below. This item would only be offered "as pictured".

We are politely requesting a determination from the ATF that this item is NOT a "firearm receiver or firearm".

Sincerely,







FEVAL  
321-418

RECEIVED  
JUL 19 2022



07/13/2022

ATF  
Firearms and Ammunition Technology Division  
244 Needy Road  
Suite 1600  
Martinsburg, West Virginia 25405

ONE LOWER RECEIVER  
AR-9 TYPE

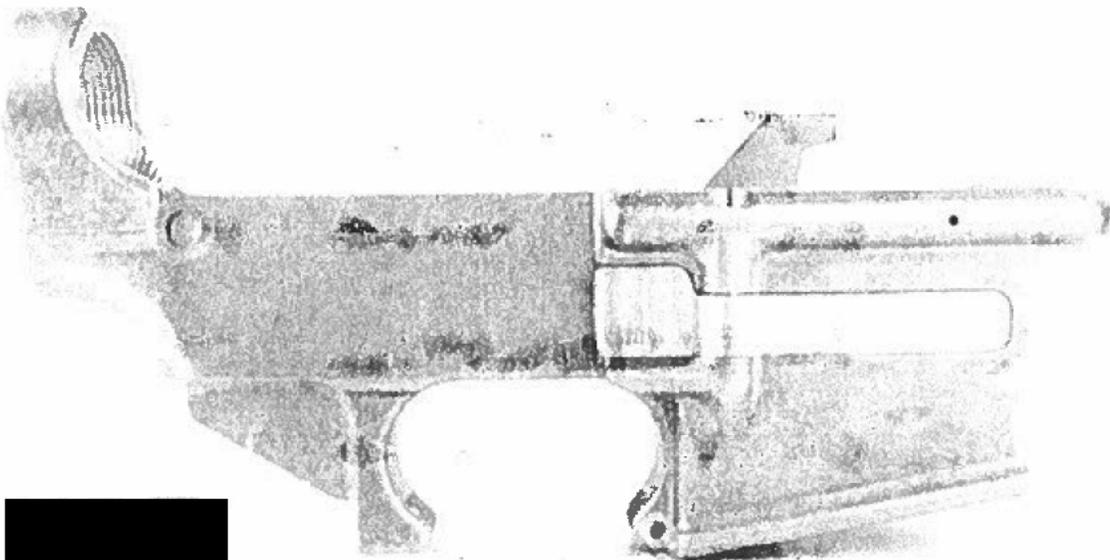
To Whom It May Concern:

We are submitting the enclosed item for classification under the Gun Control Act of 1968 (GCA).

The item is pictured below. This item would only be offered "as pictured".

We are politely requesting a determination from the ATF that this item is NOT a "firearm receiver or firearm".

Sincerely,

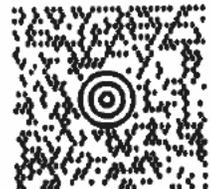


**RECEIVED**  
JUL 19 2022

[Redacted] 2 LBS 1 OF 1  
DWT: 9,6,2

**SHIP TO:**  
FIREARMS AND AMMUNITION TECHNOLOGY  
ATF  
244 NEEDY ROAD  
MARTINSBURG WV 25405

7/19/22



**MD 217 9-10**



**UPS GROUND**

TRACKING #: 1Z EEO 146 03 4046 3756



BILLING: P/P

SEE NOTES ON REVERSE REGARDING  
CUSTOMS PURPOSES, RESTRICTIONS,  
REGULATIONS, DUTIES AND TAXES

ATF  
244 NEEDY RD  
MARTINSBURG WV 25405  
P. ORANGE S. LEFT  
WOOD - MFL  
146034046 3756  
JUL 19 09:01:14 2022

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www.ups.com



EVAL.  
321-420

RECEIVED  
JUL 19 2022

07/11/2022

ATF  
Firearms and Ammunition Technology Division  
244 Needy Road  
Suite 1600  
Martinsburg, West Virginia 25405

ONE  
AR-10 TYPE  
LOWER RECEIVER

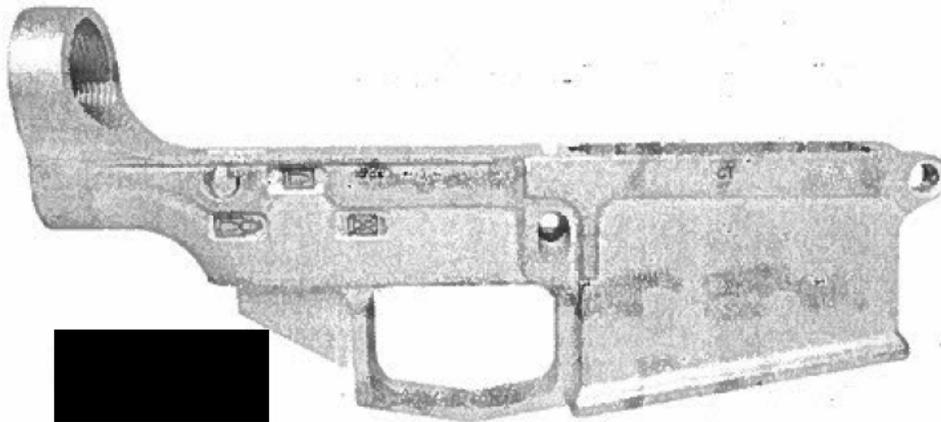
To Whom It May Concern:

We are submitting the enclosed item for classification under the Gun Control Act of 1968 (GCA).

The item is pictured below. This item would only be offered "as pictured".

We are politely requesting a determination from the ATF that this item is NOT a "firearm receiver or firearm".

Sincerely,



RECEIVED  
JUL 19 2022

2 LBS 1 OF 1  
DWT: 10,6,2

SHIP TO:  
FIREARMS AND AMMUNITION TECHNOLOGY  
ATF  
244 NEEDY ROAD  
MARTINSBURG WV 25405

7/29/22

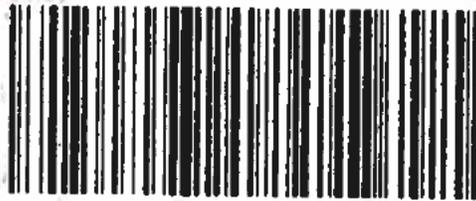


MD 217 9-10



UPS GROUND

TRACKING #: 1Z EEO 146 03 4219 7764



BILLING: P/P

26.0.7 Zebra ZP 450 20 0A 07/2022



NOTICE BY RETURN (regarding UPS terms and conditions of service) is available at [www.ups.com](http://www.ups.com).  
Customer support is available from the U.S. 24-hour call center at 1-800-453-4343.  
Restrictions: In-service product is for in-warehouse use only.

By the sender, addressee and recipient, the liability for the goods is transferred to the addressee and recipient upon receipt from the U.S. in accordance with the Terms and Conditions of the U.S. Mail (18 U.S.C. 1103).

1Z EEO 146 03 4219 7764  
JUL 19 09:12:18 2022  
MFL  
P: ORANGE S: LEFT  
MARTINSBURG WV 25405  
ATF  
244 NEEDY RD

July 21, 2022

Via Federal Express  
U.S. Department of Justice  
Bureau of Alcohol, Tobacco, Firearms and Explosives  
Firearms Technology Industry Service Branch  
Attn: Daniel Hoffman  
244 Needy Road  
Martinsburg, West Virginia 25405

EVAL.  
321-564

RECEIVED  
JUL 28 2022

Subject: [REDACTED]

Dear Chief Hoffman,

Enclosed, please find the [REDACTED] ✓  
chambered in 40S&W. It has a 3.26" barrel length. An  
overall length of 6.2 inches. Serial number is [REDACTED] ✓ Score of 89

If approved, this model will be marked in accordance with the requirements set forth in 27 CFR 478.92,  
et seq.

Please return these firearms to us after evaluation. A prepaid return shipping label with tracking is  
enclosed.

Best Regards,

[REDACTED]

[REDACTED]

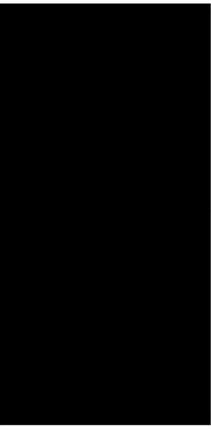
President and CEO

U.S. Department of Justice  
Bureau of Alcohol, Tobacco, Firearms and Explosives

## Factoring Criteria for Weapons

NOTE: The Bureau of Alcohol, Tobacco, Firearms and Explosives reserves the right to preclude importation of any revolver or pistol which achieves an apparent qualifying score but does not adhere to the provisions of Section 925(d)(3) of Amended Chapter 44, Title 18 U.S.C.

Pistol				Revolver			
Model: [REDACTED] 40 S&W)				Model:			
<b>Prerequisites</b> 1. The pistol must have a positive manually operated safety device. 2. The combined length and height must not be less than 10" with the height (right angle measurement to barrel without magazine or extension) being at least 4" and the length being at least 6".				<b>Prerequisites</b> 1. Must pass safety test. 2. Must have overall frame (with conventional grips) length (not diagonal) of 4 1/2" minimum. 3. Must have a barrel length of at least 3".			
Individual Characteristics		Point Value	Point Sub Total	Individual Characteristics		Point Value	Point Sub Total
Overall Length For Each 1/4" Over 6"                      6.2		1		<b>Barrel Length (Muzzle to Cylinder Face)</b> Less Than 4"		0	
<b>Frame Construction</b>				For Each 1/4" Over 4"		1/2	
Investment Cast or Forged Steel		15	15	<b>Frame Construction</b>			
Investment Cast or Forged Hts Alloy		20		Investment Cast or Forged Steel		15	
<b>Weapon Weight W/Magazine (unloaded)</b>				Investment Cast or Forged Hts Alloy		20	
Per Ounce                      22		1	22	Weapon Weight (Unloaded)			
<b>Caliber</b>				Per Ounce		1	
.22 Short and .25 Auto		0		<b>Caliber</b>			
.22 LR and 7.65MM to .380 Auto		3		.22 Short to .25 ACP		0	
9mm Parabellum and Over		10	10	.22 LR and .30 to .38 S&W		3	
<b>Safety Features</b>				.38 Special		4	
Locked Breech Mechanism		5	5	.357 Mag and Over		5	
Loaded Chamber Indicator		5	5	<b>Miscellaneous Equipment</b>			
Grip Safety		3		Adjustable Target Sights (Drift or Click)		5	
Magazine Safety		5		Target Grips		5	
Firing Pin Block or Lock		10	10	Target Hammer and Target Trigger		5	
<b>Miscellaneous Equipment</b>				<b>Safety Test</b>			
External Hammer		2		A double action revolver must have a safety feature which automatically (or in a single action revolver by manual operation) causes the hammer to retract to a point where the firing pin does not rest upon the primer of the cartridge. The safety device must withstand the impact of a weight equal to the weight of the revolver dropping from a distance of 36" in a line parallel to the barrel upon the rear of the hammer spur, a total of 5 times.			
Double Action		10	10				
Drift Adjustable Target Sight		5	5				
Click Adjustable Target Sight		10					
Target Grips		5	5				
Target Trigger		2	2				
<b>Score Achieved</b> (Qualifying Score is 75 Points)			89	<b>Score Achieved</b> (Qualifying Score is 45 Points)			0

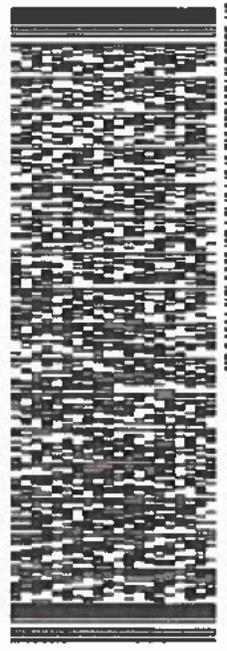


SHIP DATE: 25 JUL 22  
ACTWGST: 1.00 LB  
CAD: 25058129/NET4490  
BILL SENDER

TO DANIEL HOFFMAN  
TECHNOLOGY INDUSTRY SERVICE BRANCH  
244 NEEDY RD

MARTINSBURG WV 25405  
(304) 616-4583  
INV  
PO  
REF: INV 83270339/ANB#77-10804764  
DEPT: IMPORT/EXPORT

**REGISTERED MAIL**  
JUL 21 2022  
NEW YORK



TRK# 7774 8044 0323  
0201

TUE - 26 JUL 4:30P  
STANDARD OVERNIGHT

**XE WDBA**

ASR 25405  
IAD  
WV-US



**After printing this label:**

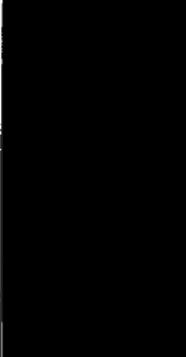
1. Use the 'Print' button on this page to print your label to your laser or inkjet printer.
2. Fold the printed page along the horizontal line.
3. Place label in shipping pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.

**Warning: Use only the printed original label for shipping. Using a photocopy of this label for shipping purposes is fraudulent and could result in additional billing charges, along with the cancellation of your FedEx account number.**

Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on fedex.com. FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is \$1,000, e.g. jewelry, precious metals, negotiable instruments and other items listed in our Service Guide. Written claims must be filed within strict time limits, see current FedEx Service Guide.

7/25/22, 4:16 PM

FedEx Ship Manager - Print Your Label(s)



SHIP DATE: 25 JUL 22  
ACTWGST: 1.00 LB  
CAD: 250568120MINET449D  
BILL SENDER

TO DANIEL HOFFMAN  
TECHNOLOGY INDUSTRY SERVICE BRANCH  
244 NEEDEY RD

MARTINSBURG WV 25405

(304) 616-4583 REF: NV:83270539 / AMB6577-10904764  
PO DEPT: IMPORT/EXPORT



TRK# 7774 8044 0323  
0201  
TUE - 26 JUL 4:30P  
STANDARD OVERNIGHT  
ASR  
25405

XE WDBA  
WV-US IAD



RECEIVED  
JUL 28 2022  
SAMPLE

**After printing this label:**

1. Use the 'Print' button on this page to print your label to your laser or inkjet printer.
2. Fold the printed page along the horizontal line.
3. Place label in shipping pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.

**Warning:** Use only the printed original label for shipping. Using a photocopy of this label for shipping purposes is fraudulent and could result in additional billing charges, along with the cancellation of your FedEx account number.

Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on fedex.com. FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is \$1,000, e.g. jewelry, precious metals, negotiable instruments and other items listed in our Service Guide. Written claims must be filed within strict time limits, see current FedEx Service Guide.

EVAL. 316-778



321-736

5.17.2021

RECEIVED  
MAY 24 2021  
BY: FAD

THREE  
AR-15  
Receivers

To whom it may concern,

I am writing and submitting 3 versions of our lower receiver as an 80% unit for production. Please inform as to whether all three suffice as an 80% classification. Thank you for your time.

Regards,



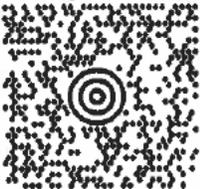
3 LBS 1 OF 1

**RECEIVED**  
MAY 24 2021

SHIP TO:  
FTISB  
BUREAU OF ATF  
SUITE 1600  
244 NEEDY ROAD  
MARTINSBURG WV 25405

BY: *FA70*

*5/24/2021*

 **MD 217 9-10**  


**UPS GROUND**  
TRACKING #: 1Z 923 3XY 03 4096 3981



BILLING: P/P

UPS  
ALL NOTICE ON GENERAL regarding UPS's terms and notice of limitation of liability where allowed by law. UPS® authorizes UPS to act as forwarding agent for export carrier and customs purposes. If exported from the US, shipping conditions that the commodities, technology or software were shipped from the US in accordance with the Export Administration Regulations. Consistent with law as published. ©2021 UPS Inc.

EVAL. 316-778



321-738

5.17.2021

RECEIVED  
MAY 24 2021  
BY: FAD

THREE  
AR-15  
Receivers

To whom it may concern,

I am writing and submitting 3 versions of our lower receiver as an 80% unit for production. Please inform as to whether all three suffice as an 80% classification. Thank you for your time.

Regards,



3 LBS 1 OF 1

RECEIVED

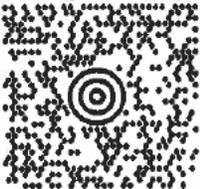
MAY 24 2021

BY: *FA70*

SHIP TO:  
 FTISB  
 BUREAU OF ATF  
 SUITE 1600  
 244 NEEDY ROAD  
 MARTINSBURG WV 25405

*5/24/2021*

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MD 217 9-10



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UPS GROUND

TRACKING #: 1Z 923 3XY 03 4096 3981

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BILLING: P/P

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 ALL NOTICE ON GENERAL regarding UPS's terms and notice of limitation of liability where allowed by law. UPS® authorizes UPS to act as forwarding agent for export carrier and customs purposes. If exported from the US, shipping carrier has the commodities, technology or software were exported from the US in accordance with the Export Administration Regulations. Consistent with law as published. 4000 © 2011

EVAL: 317-998

To whom it may concern, 321-788

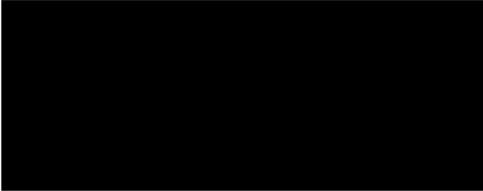
RECEIVED  
OCT 06 2021  
KATO  
BY: .....

[REDACTED] of [REDACTED] s submitting the enclosed three (AR15, AR9, and AR45 style) partial lower receivers for classification determination. The products are made of 6061 aluminum and partially machined out. We are requesting a determination letter of your findings be returned with the lowers after your inspection is complete.

THREE  
RECEIVERS

Thank you for your time,

[REDACTED]

<b>P</b>	<b>US POSTAGE AND FEES PAID</b>	<b>easypost.</b> <small>easypost.com/shipit</small>
	2021-10-04 25405 C1656276 ComPlsPrice FLAT RATE MED BOX	 0901000003677
<b>USPS PRIORITY MAIL</b>		
BUREAU OF ALCOHOL, TOBACCO, FIREARMS, AND EXPLOSIVES FIREARMS & AMMUNITION TECHNOLOGY DIVISION ATTN: FTISB 244 NEEDEY ROAD SUITE 1600 MARTINSBURG WV 25405		<b>0004</b>
		
Shipped via <b>XPS</b> <small>ship.com</small>		
<b>USPS TRACKING #</b>		
		
<b>9405 5361 0899 2429 8493 00</b>		
(return label)		

**P**

US POSTAGE AND FEES PAID

easypost.

2021-10-04

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FLAT RATE MED BOX



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USPS PRIORITY MAIL

0004



10/6/21

BUREAU OF ALCOHOL, TOBACCO, FIREAR  
ATTN: FTISE  
244 NEFDY ROAD SUITE 1600  
MARTINSBURG WV 25405

RECEIVED  
OCT 06 2021  
BY: FTIR

Shipped via **XPS** ship.com

USPS TRACKING #



9405 5361 0899 2429 8392 64

EJAL: 317-998

To whom it may concern,

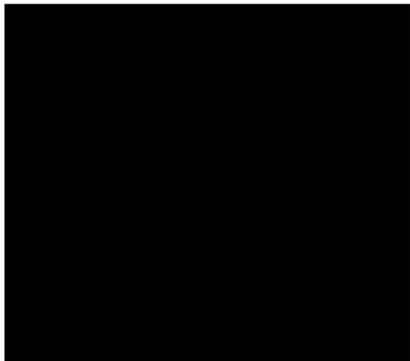
321-790

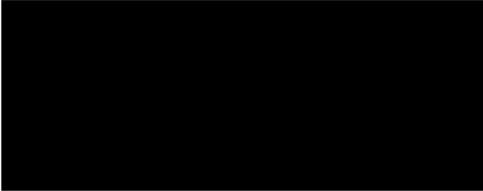
RECEIVED  
OCT 06 2021  
BY: KATO

[REDACTED] of [REDACTED] is submitting the enclosed three (AR15, AR9, and AR45 style) partial lower receivers for classification determination. The products are made of 6061 aluminum and partially machined out. We are requesting a determination letter of your findings be returned with the lowers after your inspection is complete.

THREE  
RECEIVERS

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<b>P</b>	<b>US POSTAGE AND FEES PAID</b>	<b>easypost.</b> <small>easypost.com/shipit</small>
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Shipped via <b>XPS</b> <small>ship.com</small>		
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US POSTAGE AND FEES PAID

easypost.

2021-10-04

26554

C1856276

ComPisPrice

FLAT RATE MED BOX



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USPS PRIORITY MAIL

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10/6/21

BUREAU OF ALCOHOL, TOBACCO, FIREAR  
ATTN: FTISE  
244 NEFDY ROAD SUITE 1600  
MARTINSBURG WV 25405

RECEIVED  
OCT 06 2021  
BY: FTIR

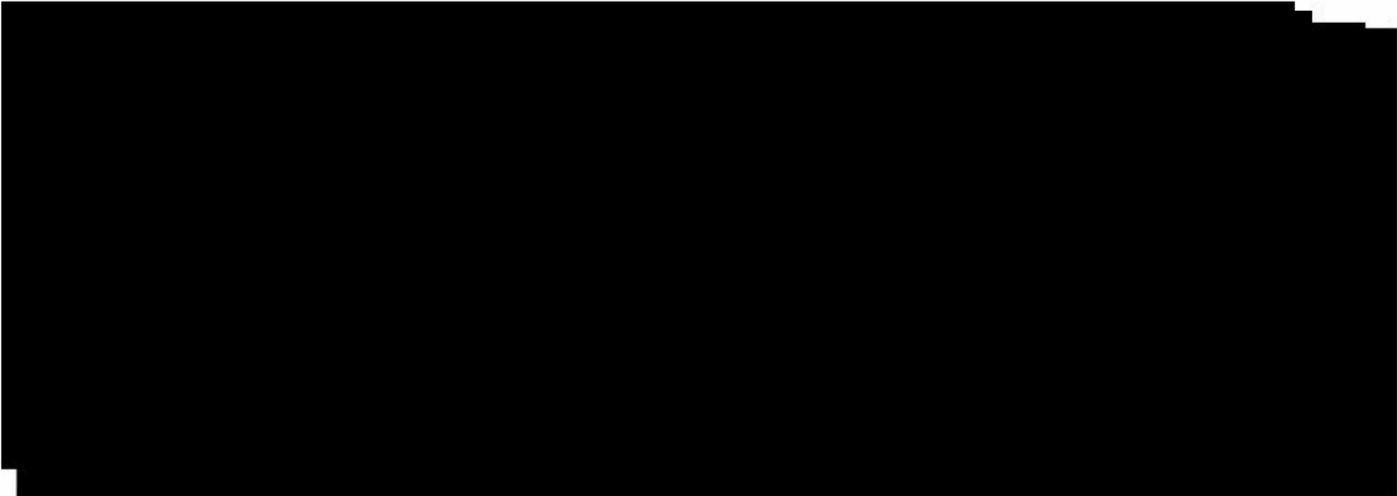
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USPS TRACKING #



9405 5361 0899 2429 8392 64

RECEIVED  
OCT 13 2022



To Whom It May Concern,

FOUR  
RECEIVERS

Please consider the four enclosed samples for classification and individual letters of determination. The samples are composed of Billet 6061-T6 aluminum and machined for the intended use as unfinished AR lower receiver blanks. Please use the enclosed label to return the samples along with your letters of determination upon completion of your evaluation.

EX. 1 EVAL. 322-526

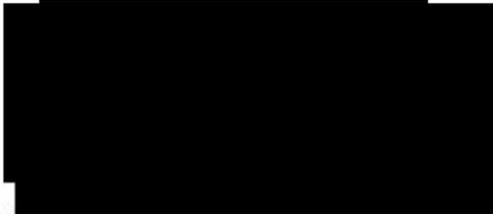
EX. 2 EVAL. 322-528

Thank you,

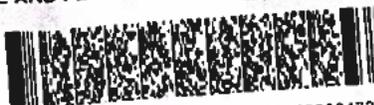
EX. 3 EVAL. 322-530

EX. 4 EVAL. 322-532

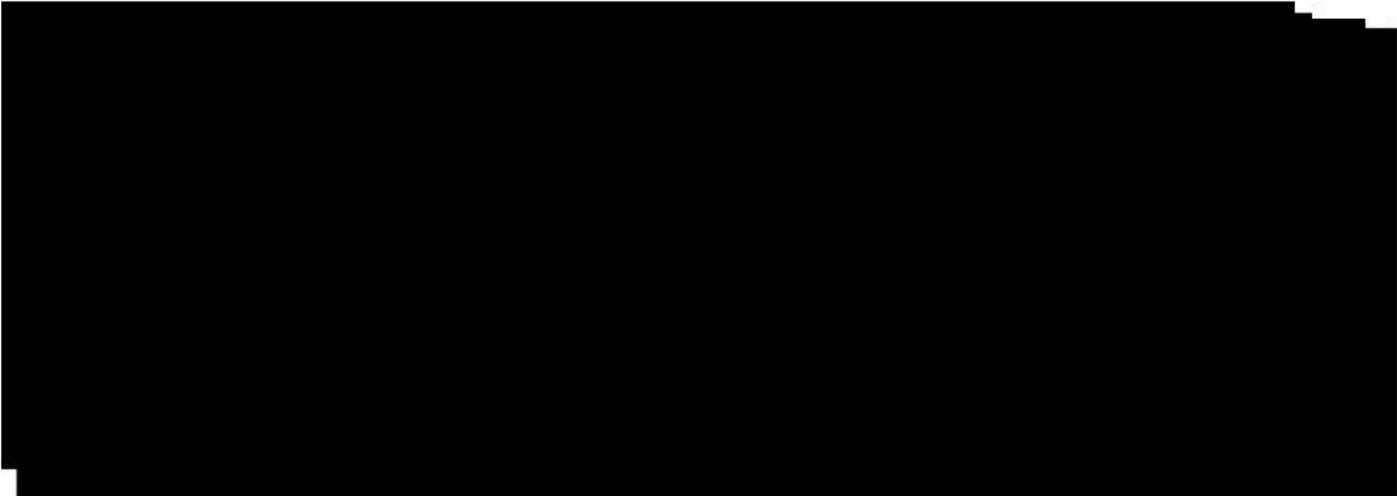


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Shipped via <b>XPS</b> <sub>ship.com</sub>		
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OCT 13 2022

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Shipped via <b>XPS</b> ship.com		
<b>USPS TRACKING #</b>		
		
<b>9405 5361 0936 1884 3156 58</b>		

RECEIVED  
OCT 13 2022



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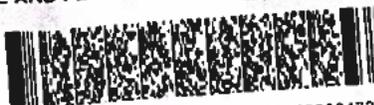
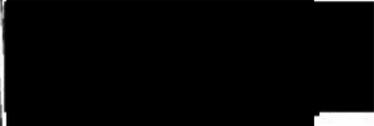
EX. 3 EVAL. 322-530

EX. 4 EVAL. 322-532

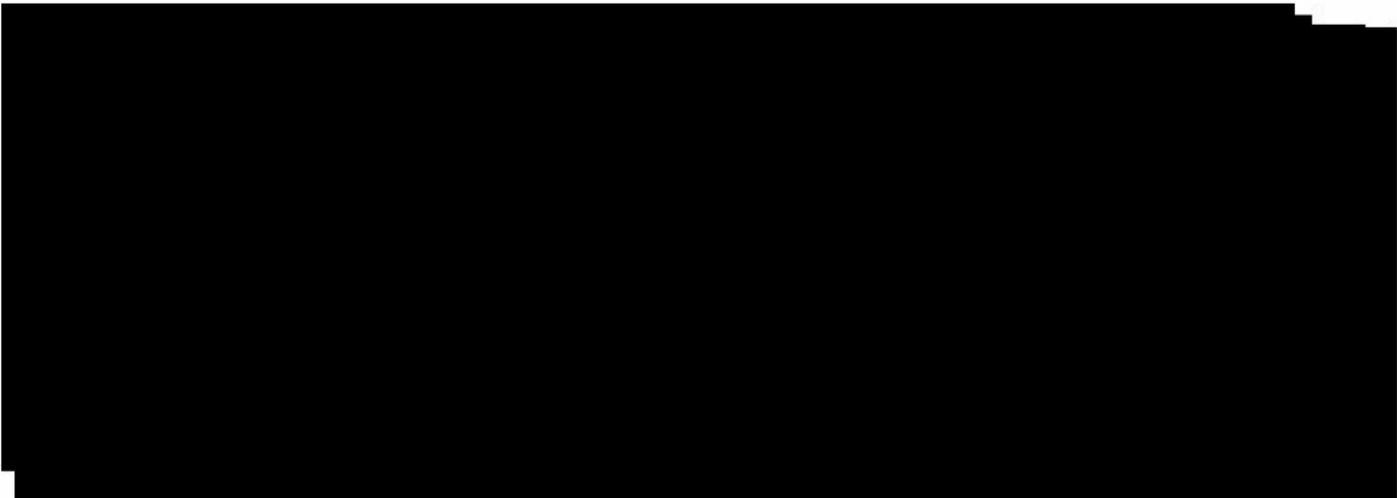


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Shipped via <b>XPS</b> <small>ship.com</small>		
<b>USPS TRACKING #</b>		
		
<b>9405 5361 0936 1884 3156 58</b>		

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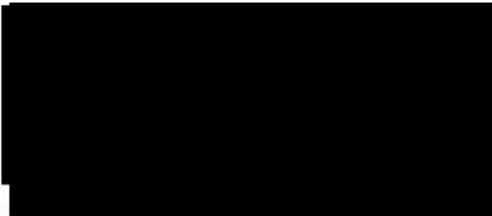
EX. 2 EVAL. 322-528

Thank you,

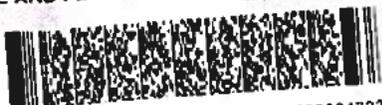
EX. 3 EVAL. 322-530

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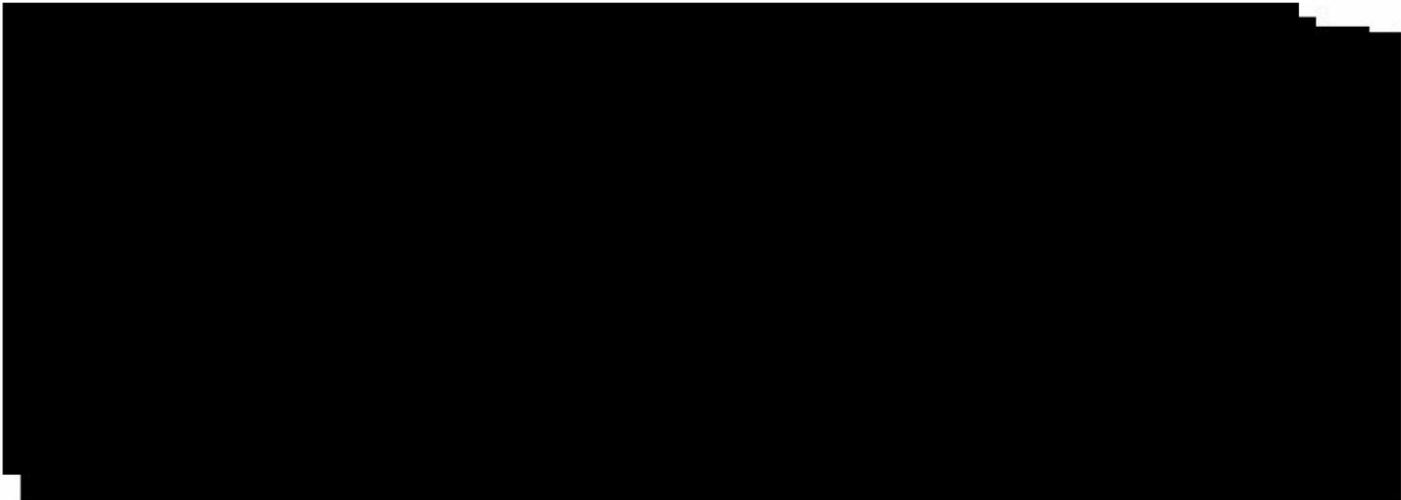


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Shipped via <b>XPS</b> <sub>ship.com</sub>		
<b>USPS TRACKING #</b>		
		
<b>9405 5361 0936 1884 3185 29</b>		

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Shipped via <b>XPS</b> ship.com		
<b>USPS TRACKING #</b>		
		
<b>9405 5361 0936 1884 3156 58</b>		

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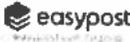
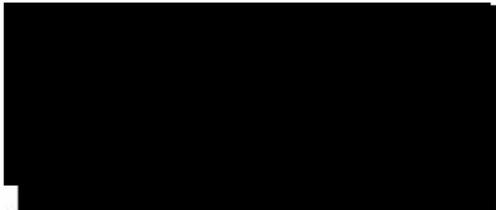
EX. 2 EVAL. 322-528

Thank you,

EX. 3 EVAL. 322-530

EX. 4 EVAL. 322-532



<b>P</b>	<b>US POSTAGE AND FEES PAID</b>	
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Shipped via <b>XPS</b> <sub>ship.com</sub>		
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OCT 13 2022

<b>P</b>	<b>US POSTAGE AND FEES PAID</b>	<b>easypost</b> www.easypost.com/eng-us
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		<b>0004</b>
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Shipped via <b>XPS</b> <sub>ship.com</sub>		
<b>USPS TRACKING #</b>		
		
<b>9405 5361 0936 1884 3156 58</b>		

EVAL.

10/12/2022

322-596



Firearms & Ammunition Technology Division  
BATFE  
244 Needy Rd  
Martinsburg, WV 25405

RECEIVED  
OCT 18 2022

RE: Firearm Classification

Good Day!

ONE AR-15 Receiver

I am sending this letter to ask for a "Letter of Determination" for the classification of the enclosed item in reference to Final Rule 2021-R-05F, that addresses commonly named 80% AR Style Lower Receiver.

The [REDACTED] is a current FFL Type 07 which manufactures components for OEMs in the industry.

In 2013 we received the enclosed Determination Letter stating our product was not controlled by the GCA or NFA.

Under the new classification to take effect August 24, 2022, I am formally requesting a Determination under the new Rules for the enclosed item.

The features omitted from this configuration are as followed:

- 1. Fire-control cavity
- 2. Selector-lever hole
- 3. Trigger slot
- 4. Trigger pin hole
- 5. Hammer pin hole

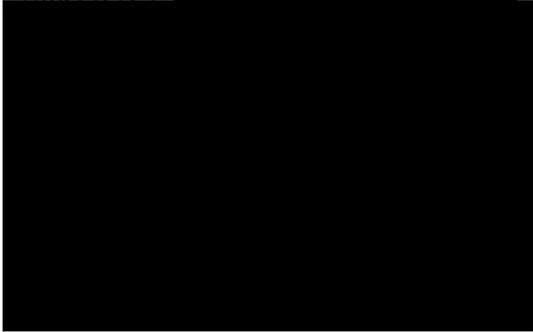
Under the original Determination letter, this product is sold as a Single Item Only in Bulk and NOT with any other complimentary products, example: Completion Jig or Firearm Kit.

On October 6, 2022 I received a Determination letter stating a submission from June was determined a firearm due to the pocket of in the receiver measured .830".



This submission, measures .795” by our measurement and we are requesting a review of this configuration.

Sincerely,



- Enclosures:
- Letter Request for Determination – 9/15/2013 A-1
  - ATF Response Letter – 11/12/2013 A-2
  - Reference Drawing: Lower-Brick-B A-3
  - Item for determination
  - Return Shipping Label – UPS
  - Determination of submission – October 6, 2022



9-15-2013

Firearms Technology Branch  
BATFE  
244 Needy Rd  
Martinsburg, WV 25405

RECEIVED  
OCT 18 2022

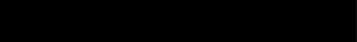
A-1

RE: Firearm Classification

Good Day!

I am sending this letter to ask for a "Letter of Determination" for the classification of the enclosed items.

Specifically our inquiry is if the enclosed AR-style partially completed receiver is/would be classified as a "firearm" under the Gun Control Act of 1968 (GCA).

The  is a current FFL Type 07 which manufactures AR-style receivers for commercial FFL Type 07 via variances filed through the BATFE. We have many requests to supply customers with partially complete receivers, which we chose not to until we get an "official determination of classification".

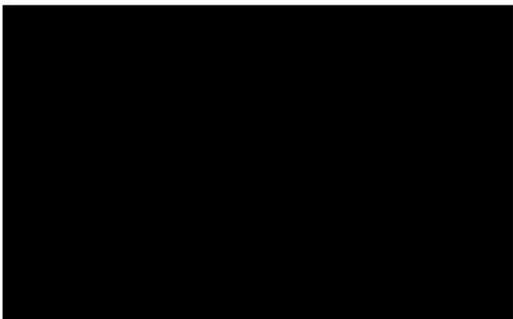
We recently were informed by Firearms Technology Branch via our recent inquiry that the "takedown" pocket addition is acceptable with the Fire Control Group pocket solid. After review, we are asking for a determination for the current configuration with a modified "takedown" pocket to a .800" length.

The features omitted from this configuration are as followed:

1. Fire-control cavity (need to be completed).
2. Selector-lever hole (need to be completed).
3. Trigger slot (need to be completed).
4. Trigger pin hole (need to be completed).
5. Hammer pin hole (need to be completed).

Please contact me directly for any questions or comments about this inquiry.

Sincerely,



Enclosures: Reference Drawing: Lower-Brick-B  
Inquired partially completed receiver  
Return Shipping Instructions

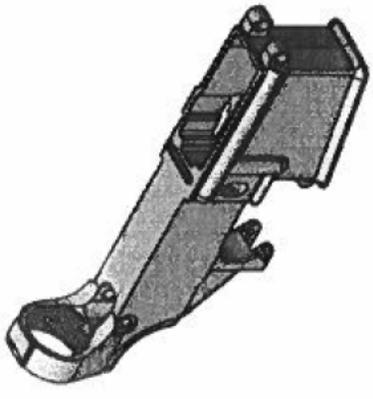
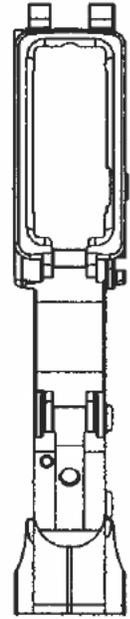
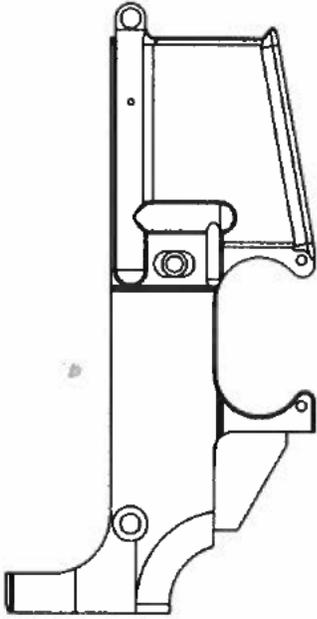
P/N: RT-20138-02 Rev. B

4-3

Notes:  
 1. Maximal Condition  
 2.

**BATFE REFERENCE DRAWING  
 FOR FIREARM CLASSIFICATION**

REVISIONS			
REV	DESCRIPTION	DATE	APPROVED
6	Modified Length of Take-down Pocket to .805	9/15/2013	MJP



UNLESS OTHERWISE SPECIFIED:	DESIGNER	NAME	DATE
CONTOURS ARE 1:1 TO NC			
COMPLIANCE WITH:			
FEDERAL REGISTER			
17 CFR 171.10			
17 CFR 171.11			
17 CFR 171.12			
17 CFR 171.13			
17 CFR 171.14			
17 CFR 171.15			
17 CFR 171.16			
17 CFR 171.17			
17 CFR 171.18			
17 CFR 171.19			
17 CFR 171.20			
17 CFR 171.21			
17 CFR 171.22			
17 CFR 171.23			
17 CFR 171.24			
17 CFR 171.25			
17 CFR 171.26			
17 CFR 171.27			
17 CFR 171.28			
17 CFR 171.29			
17 CFR 171.30			
17 CFR 171.31			
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17 CFR 171.96			
17 CFR 171.97			
17 CFR 171.98			
17 CFR 171.99			
17 CFR 171.100			

**LOWER - BRICK-B**

SIZE Part No. **B** REV **B**  
 RT-20138-02  
 SCALE: 1:2 WEIGHT: SHEET 2 OF 2



U.S. Department of Justice

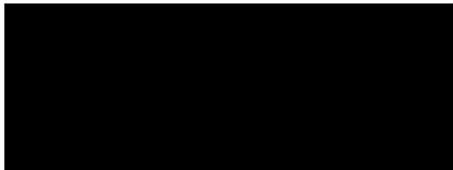
Bureau of Alcohol, Tobacco,  
Firearms and Explosives

*Firearms Technology Industry Services Branch*

244 Needy Road, Suite 1600  
Martinsburg, WV 25405  
www.atf.gov

907010:JWM  
3311/321192

October 6, 2022

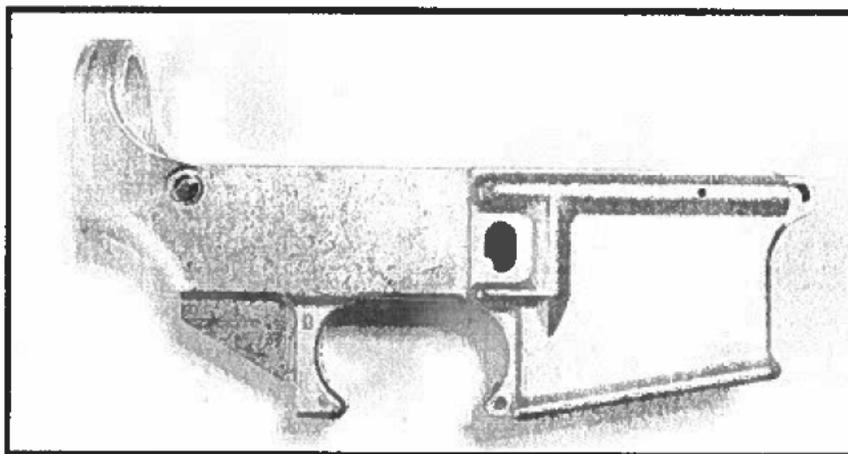


RECEIVED  
OCT 18 2022

This is in response to your correspondence to the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), Firearms Technology Industry Services Branch (FTISB), which accompanied your submitted sample of one partially complete AR-type receiver. Specifically, you requested an evaluation and classification of the submitted sample under the Gun Control Act of 1968 (GCA), 18 U.S.C. § 921(a)(3), as implemented by the Final Rule – 2021R-05F, effective August 24, 2022, which amended the regulatory definition of the term “**frame or receiver**” in 27 CFR § 478.12.



Submission



FTISB has determined that the submitted sample, may “readily be completed, assembled, restored or otherwise converted to function as a frame or receiver.” Therefore, even taken alone, the submitted partially complete AR-type receiver is a “**firearm**” as defined in the GCA, 18 U.S.C. § 921(a)(3). Please note this classification only applies to the sample itself, precisely as submitted.

**Background:**

The GCA, 18 U.S.C. § 921(a)(3), defines the term “**firearm**” as: “... (A) any weapon (including a starter gun) which will or is designed to or may readily be converted to expel a projectile by the action of an explosive; (B) **the frame or receiver of any such weapon**; (C) any firearm muffler or firearm silencer; or (D) any destructive device. Such term does not include an antique firearm.”

27 CFR § 478.12(a) defines the terms “**frame or receiver**” as: “(1) The term “**frame**” means the part of a handgun, or variants thereof, that provides housing or a structure for the primary energized component designed to hold back the hammer, striker, bolt, or similar component prior to initiation of the firing sequence (i.e., sear or equivalent), even if pins or other attachments are required to connect such component to the housing or structure. (2) The term “**receiver**” means the part of a rifle, shotgun, or projectile weapon other than a handgun, or variants thereof, that provides housing or a structure for the primary component designed to block or seal the breech prior to initiation of the firing sequence (i.e., bolt, breechblock, or equivalent), even if pins or other attachments are required to connect such component to the housing or structure.”

27 CFR 478.12(f)(1)(i) specifically designates “the lower part of the weapon that provides housing for the trigger mechanism and hammer (i.e., lower receiver)” as the “**receiver**” of the AR-type weapons.

27 CFR § 478.12(c) defines “**Partially complete, disassembled, or nonfunctional frame or receiver**” as: “The terms “**frame**” and “**receiver**” shall include a partially complete, disassembled, or nonfunctional frame or receiver, including a frame or receiver parts kit, that is designed to or may readily be completed, assembled, restored, or otherwise converted to function as a frame or receiver, i.e., to house or provide a structure for the primary energized component of a handgun, breech blocking or sealing component of a projectile weapon other than a handgun, or internal sound reduction component of a firearm muffler or firearm silencer, as the case may be. The terms shall not include a forging, casting, printing, extrusion, unmachined body, or similar article that has not yet reached a stage of manufacture where it is clearly identifiable as an unfinished component part of a weapon (e.g., unformed block of metal, liquid polymer, or other raw material). When issuing a classification, the Director may consider any associated templates, jigs, molds, equipment, tools, instructions, guides, or marketing materials that are sold, distributed, or possessed with the item or kit, or otherwise made available by the seller or distributor of the item or kit to the purchaser or recipient of the item or kit.”

27 CFR § 478.11 and 27 CFR § 479.11 both define the term “**readily**” as: “A process, action, or physical state that is fairly or reasonably efficient, quick, and easy, but not necessarily the most efficient, speediest, or easiest process, action, or physical state. With respect to the classification of firearms, factors relevant in making this determination include the following:

- (a) Time, i.e., how long it takes to finish the process;
- (b) Ease, i.e., how difficult it is to do so;
- (c) Expertise, i.e., what knowledge and skills are required;

- (d) *Equipment, i.e., what tools are required;*  
(e) *Parts availability, i.e., whether additional parts are required, and how easily they can be obtained;*  
(f) *Expense, i.e., how much it costs;*  
(g) *Scope, i.e., the extent to which the subject of the process must be changed to finish it;*  
*and*  
(h) *Feasibility, i.e., whether the process would damage or destroy the subject of the process, or cause it to malfunction."*

**Evaluation:**

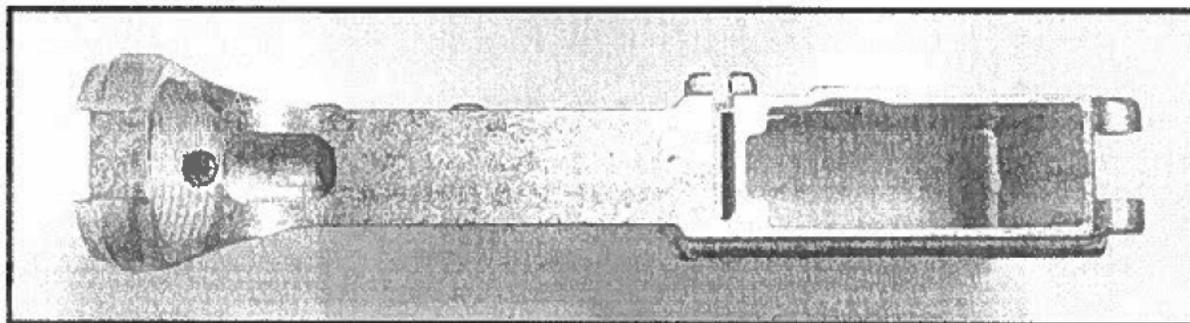
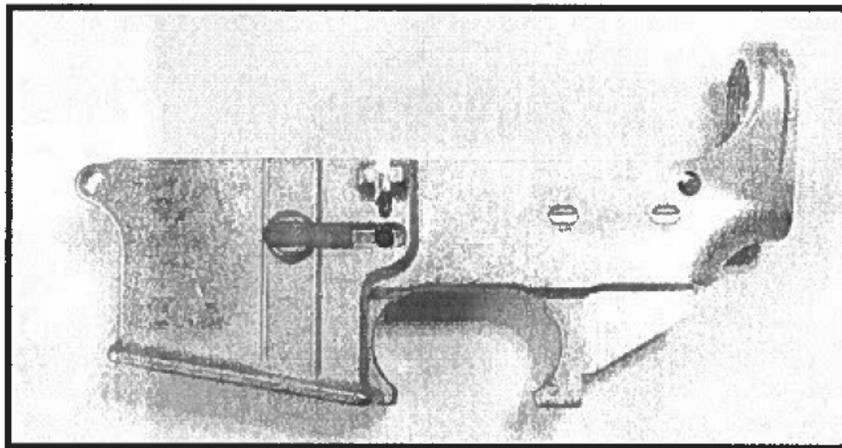
As noted above, ATF conducts its classification review of the submitted sample, precisely as submitted. Based on the statutory and regulatory definitions above, a partially complete AR-type receiver alone, with no indexing or machining of any kind performed in the area of the fire control cavity (except the .800 inch takedown pin area, explained below) will be examined to ascertain if it can "readily be completed, assembled, restored or otherwise converted to function as a frame or receiver." We note that even when a sample is not classified as a "receiver," or "firearm," that determination can change if it is sold, distributed, marketed, possessed, or otherwise made available with any associated templates, jigs, molds, equipment, tools, instructions, or guides, such as within a receiver parts kit.

In an AR-type receiver, the "fire control cavity" is the critical area of the receiver because this area "provides housing for the trigger mechanism and hammer." 27 CFR 478.12(f)(1)(i). To be a "functional" receiver, an AR-type receiver must include a cavity sufficient to house the relevant internal parts, including a hole for a selector and 2 pin holes (trigger pin and hammer pin) in precise locations. Removing or indexing any material in this critical area, or completing or indexing any of these holes, or other similar indexing, machining or forming of this area, is therefore a crucial step in producing a functional receiver.

Because the front of the takedown pin lug clearance area merges with the back of the fire-control cavity in a functional AR-type receiver, it was necessary for ATF to determine the point at which the takedown pin lug clearance area stops, and the fire-control cavity begins. Accordingly, ATF has determined that drilling or milling a standard .800 inch takedown pin area, measured from immediately forward of the front of the buffer retainer hole, next to the fire control cavity, does not impact the ability of the fire control cavity to house the trigger mechanism and hammer. Provided this length is not exceeded, the fire control cavity remains "*without critical interior areas, having been indexed, machined or formed*" as stated in 27 CFR 478.12(c), example 4.

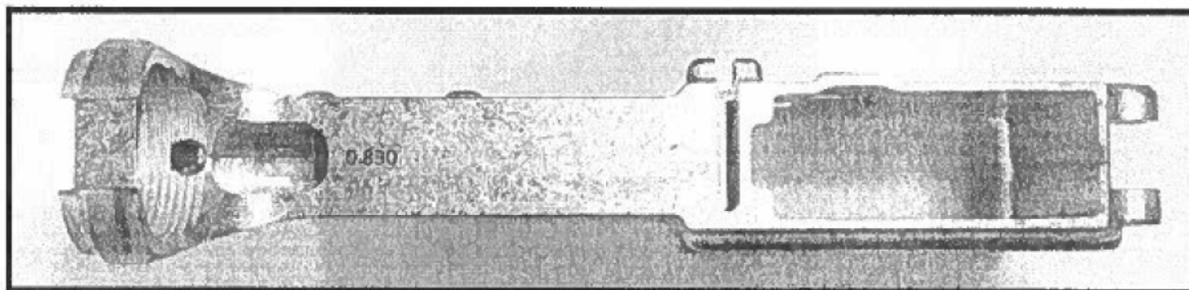
Results of the FTISB evaluation of the submission, are as follows:

**Submission**



**Submission (top view)**

The forward edge of the takedown pin lug clearance area of this sample item does measure more than .800 inch immediately forward of the front of the buffer retainer hole. Accordingly, FTISB finds that the submitted sample, is a "firearm" as defined in the GCA.



**Takedown pin clearance recess exceeds .800 inch in length (0.30 inch)**

- 5 -

321192

**Conclusion:**

FTISB has determined, based on the entire record before it, that the submitted sample may "readily be completed, assembled, restored or otherwise converted to function as a frame or receiver." Therefore, the submitted partially complete AR-type receiver is a "firearm" as defined in the GCA, 18 U.S.C. § 921(a)(3).

Please note this classification only applies to the sample exactly as submitted. The partially completed receiver, without any additional materials, which you submitted has been classified as a "firearm." Therefore, all laws and regulations that apply to firearms are fully applicable to this item, whether sold or marketed alone or as part of any other kit of package of materials.

It is important that persons engaged in the business of manufacturing, importing, or dealing in this item do not take any steps to avoid licensing (18 U.S.C. §§ 922(a)(1), 923(a)), serialization (§ 923(i); 27 CFR 478.92(a)(2)), recordkeeping (§ 923(g)(1)(A); 27 CFR 478/125(i)), or other requirements and prohibitions of the law by selling or shipping the parts or parts kits in more than one box or shipment to the same person, or by conspiring with others to do so (18 U.S.C. §§ 2, 371). Anyone engaging in the business of manufacturing, importing, or dealing in firearms, such as the one you submitted, must obtain a Federal firearms license from ATF and abide by all applicable laws and regulations, including those related to marketing, recordkeeping, and background checks. Nor may any person or entity intentionally assist another to avoid such legal requirements.

Further, this item is also considered a "defense article" on the U.S. Munitions Import List and, therefore, requires an approved Application and Permit for Importation of Firearms, Ammunition and Implements of War (ATF Form 6) for importation into the United States under 27 CFR 447.41; 447.22, and is also subject to export controls.<sup>1</sup>

The submitted sample will be returned to you under separate cover.

FTISB trusts that the foregoing has been responsive to your request for an evaluation. If we can be of any further assistance, please contact us.

Sincerely yours,  
Digitally signed by

Daniel Hoffman

Date: 2022.10.06

16:06:13 -04'00'



Daniel Hoffman

Chief, Firearms Technology Industry Services Branch

Cc:

<sup>1</sup> Exporters should consult with the U.S. Departments of Commerce and State to determine applicable requirements.



## U.S. Department of Justice

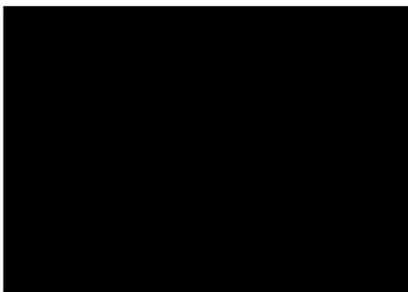
Bureau of Alcohol, Tobacco,  
Firearms and Explosives

Martinsburg, WV 25405

www.atf.gov

903050:RKD  
3311/301349

NOV 13 2013

RECEIVED  
OCT 18 2022

This is in reference to your submitted item, a partially machined AR-15 pattern receiver forging, along with supporting correspondence, recently received by the Firearms Technology Branch (FTB), Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF). You have submitted this forging (photo provided, next page) for classification under the Gun Control Act of 1968 (GCA).

Our Branch had previously determined that an AR-15 type receiver which has no machining of any kind performed in the area of the trigger/hammer recess might not be classified as a firearm. Such a receiver could have all other machining operations performed, including pivot-pin and takedown-pin hole(s) and clearance for the takedown-pin lug, but must be completely solid and un-machined in the trigger/hammer-recess area.

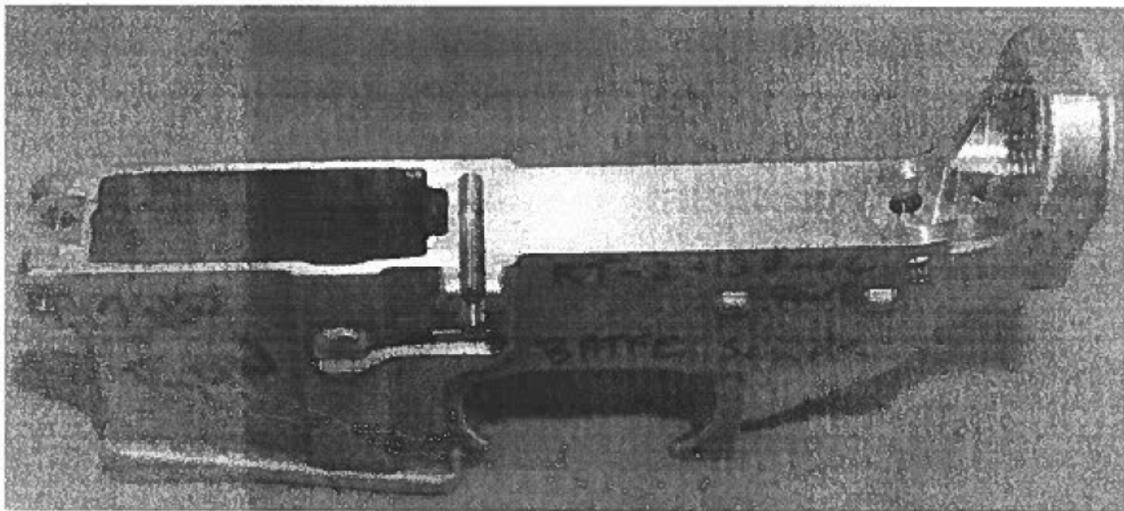
The FTB examination confirmed that the forging has been partially machined, with no machining of any kind performed in the area of the trigger/hammer recess. The machining operations performed for this sample include—

- The magazine well.
- Threads cut for receiver extension.
- Holes drilled for front and rear takedown pins.
- Holes drilled for front takedown detent and spring.
- Hole drilled and machined for magazine catch.
- Hole drilled for bolt-catch plunger and spring.

- Hole drilled for magazine-release button and spring.
- Holes drilled for trigger guard.
- Hole drilled for buffer detent and spring.
- Hole drilled and tapped for pistol grip screw.
- Take-down pin clearance recess not exceeding .800 inch in length.

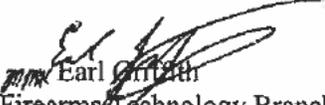
Further, the trigger/hammer recess of your submitted sample (see below) is solid, and there are no index detents machined for the safety lever or the trigger/hammer pins. Accordingly, FTB finds that the submitted item is not a "firearm" as defined in the GCA. Please note that this classification is based on the item received and examined by our Branch. Any changes to its characteristics would require re-evaluation by FTB.

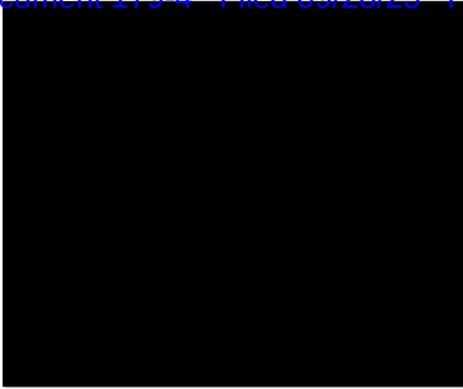
**Submitted forging**



We thank you for your inquiry and trust the foregoing has been responsive to your evaluation request. We will return your forging via your provided shipping account.

Sincerely yours,

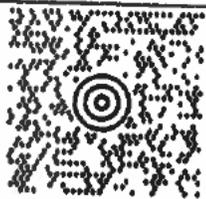
  
Earl Griffith  
Chief, Firearms Technology Branch



2 LBS

1 OF 1

DWT: 24,12,8



**MN 557 0-01**



**UPS GROUND**

TRACKING #: 1Z Y08 46E 03 9138 2100



BILLING: P/P

XOL 22.10.12

NV46 42 DA 10/2022\*



TM

**PRIORITY**  
★ **MAIL** ★

**RECEIVED**  
OCT 18 2022

FR

**P**

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PRIORITY MAIL  
ZONE 5 MEDIUM FLAT-RATE BOX  
ComBasPrice

0628000956467  
6724854  
FROM 65741



stamps  
and/or  
10/13/2022

**PRIORITY MAIL 3-DAY™**



0004

SHIP TO: Firearms Technology Division  
BATFE  
244 Needy Rd  
Martinsburg WV 25405-9431

10/18/22

**USPS TRACKING #**



9405 5111 0807 8829 1269 62

51

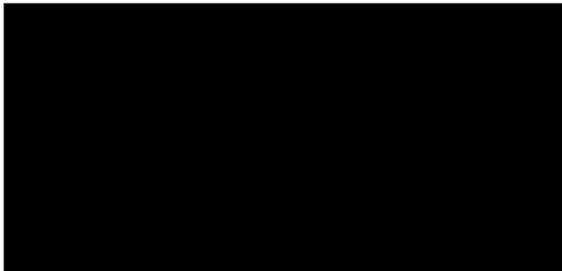
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**POSTAGE REQUIRED**

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AFFIX CUSTOMS DECLARATION.

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OCT 21 2022

EVAL.

10/14/2022

322-630

ONE RECEIVER

re:



To: Chief, FTISB

Hello,

As per direction from Senior Investigator, [redacted] of the Little Rock office, please find along with this letter (1) [redacted] Lower, for inspection and determination of the need to serialize by marking.

This particular design was conceived due to supply issues regarding the fire control group components from Germany. I designed it to accept standard semi automatic trigger components normally associated with the Colt AR15 style lower.

I was advised by [redacted] that the ruling did not affect lowers used on the [redacted] weapon, as the "upper" has always been considered the "firearm", however since I had designed a variant of the lower, [redacted] stated I should send you a complete machined lower to obtain concrete advice as to the need of marking this particular design for serial number, or if it is not going to be required under the new rulings.

Please advise as soon as you can, and when you are complete with your inspection, could you send the lower back to me?

If you have any questions, I can be reached at the number listed below.

Thank you in advance

Best regards





RECEIVED  
OCT 21 2022

Custom Tooling, CAD Design, Special Machines

CHIEF, FTISB  
244 NEEDY RD.  
SUITE 1600  
MARTINSBURG, WV 25405

2712/01

129449310  
MOC  
GRA  
MARTINS  
SUITE 1600  
244 NE  
CHIEF

SHIP CHIEF, FTISB  
TO: STE 1600  
244 NEEDY RD

MARTINSBURG WV 25405-9491

2 LBS  
SHP WT: 2 LBS  
DWT: 19.8,2  
DATE: 19 OCT 2022

UPS GROUND  
TRACKING # 1Z 9A4 83F 03 0324 3P01

MD 217 9-10

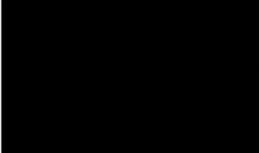
BILLING: P/P

REF #2: 12

131 13.00F 220 488 38.5U 09/2022

SEE UPS.COM FOR DETAILS. UPS does not insure the contents of packages unless declared by the shipper. Shipping charges for special services and restricted services, including but not limited to, insurance, are additional. Insurance coverage is subject to the UPS terms and conditions. ©2022 UPS of America, Inc. All rights reserved. 1000 002 0912

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OCT 21 2022



EVAL.  
322-692

RECEIVED  
OCT 26 2022

10/18/2022

ATF  
Firearms and Ammunition Technology Division  
244 Needy Road  
Suite 1600  
Martinsburg, West Virginia 25405

ONE  
AR-15  
Receiver

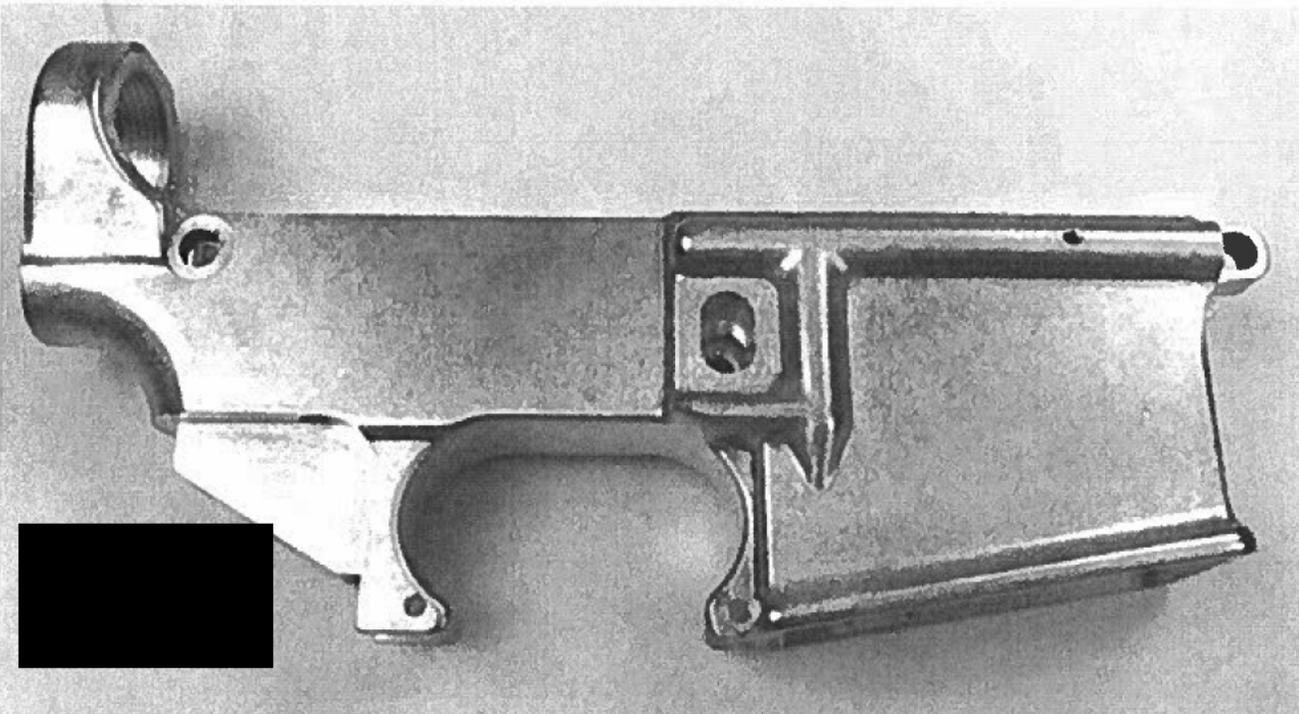
To Whom It May Concern:

We are submitting the enclosed item for classification under the Gun Control Act of 1968 (GCA).

The item is pictured below. This item would only be offered "as pictured".

We are politely requesting a determination from the ATF that this item is NOT a "firearm receiver or firearm".

Sincerely,



**RECEIVED**  
OCT 26 2022



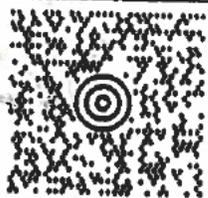
1 LBS

1 OF 1

DWT: 8,5,2

**SHIP TO:**

FIREARMS AND AMMUNITION TECHNOLOGY  
ATF  
SUITE 1600  
244 NEEDY ROAD  
MARTINSBURG WV 25405

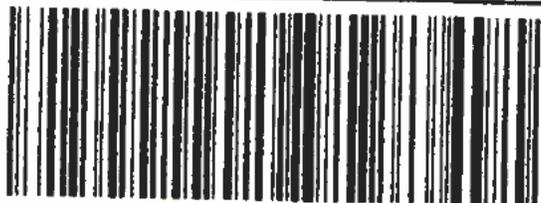


**MD 217 9-10**



**UPS GROUND**

TRACKING #: 1Z 006 Y8X 03 4840 7892



BILLING: P/P

1201878712344840  
10/2022  
MARTINSBURG WV 25405  
SUITE 1600  
244 NEEDY RD

**RECEIVED**  
OCT 26 2022

322714:

There was no incoming request in the IQ database. Only FATD's response.

[Redacted]

[Redacted]

11 August 2022

Director  
Bureau of Alcohol, Tobacco, Firearms and Explosives  
Attention: Firearms Technology Industry Services Branch  
244 Needy Rd  
Martinsburg, WV 25405  
(304) 616-4300

RE: Conditional Import [Redacted]  
ATF License [Redacted]  
Model 1: [Redacted] - S/N [Redacted]  
Model 2: [Redacted] - S/N [Redacted]

[Redacted]

To Whom It May Concern:

Thank you in advance for your consideration in the requisite inspection of these new model firearms from [Redacted] in Turkey. As previously indicated on our Form 6 application, our intended use of these sporting pistols will be for resale.

In anticipation of favorable test results, after approval please notify me via the contact information listed herein. Upon completion of your evaluation, the most expedient method to ship the firearms to our company is to send via UPS Ground, billed to recipient. Our UPS ground account number is [Redacted]

If you have any questions or concerns regarding this matter, please do not hesitate to contact me. Again, thank you for your consideration, and I look forward to hearing from you.

Respectfully,

[Redacted Signature]

[Redacted]



**U.S. Department of Justice**

Bureau of Alcohol, Tobacco,  
Firearms and Explosives

*Firearm & Explosives Imports Branch*

---

*Martinsburg, WV*

[www.atf.gov](http://www.atf.gov)

June 7, 2022

901030:JH

5330, [REDACTED]

[REDACTED]

This is in response to your permit application dated, 02 June 2022, to import firearms into the United States.

The Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) was unable to determine the import status of the firearms described on your application from the information provided. The regulations (27 CFR 478.116) provide that the Director may authorize the conditional importation of a firearm for the purpose of examining and testing the firearm in order to determine the import status.

We have conditionally approved your permit application to allow you to import (1) [REDACTED] [REDACTED] pistol and (1) [REDACTED] [REDACTED] pistol to the Firearms Technology Industry Services Branch (FTISB) for an import evaluation. When submitting the firearm to ATF for examination and testing, please enclose the following documentation;

- (1) a copy of this letter and corresponding ATF Form 6 Part I permit;
- (2) manufacturers' information for the firearm;
- (3) the reason(s) for testing the firearm; and
- (4) any additional information that will assist FTISB in the examination and testing of the firearm.

-2-

[REDACTED]

This permit is authorized under the condition that the firearm be shipped under U. S. Customs and Border Protection supervision directly to the:

Director  
Bureau of Alcohol, Tobacco, Firearms and Explosives  
Attention: Firearms Technology Industry Services Branch  
244 Needy Road  
Martinsburg, WV 25405  
(304) 616-4300

If a determination is made that the firearm may not be imported, you have three alternatives:

- (1) destroy the firearm;
- (2) abandon the firearm to ATF or Customs; or
- (3) arrange for exportation of the firearm from the United States pursuant to an export license issued by the Office of Defense Trade Controls, Department of State, if existing U.S. Government policy does not preclude the issuance of a license for such exportation.

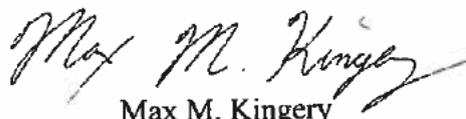
Samples may be shipped to ATF via FedEx, FedEx Ground or the United Parcel Service. All freight shipments and courier delivery shipments can only be received Monday through Thursday between 0800 and 1500 hours; or Friday 0800 to 1330. Please call the Firearms Technology Industry Services Branch at (304) 616-4300 should you need additional assistance. Do not ship any type of ordnance, explosives or hazardous materials to the Firearms Technology Industry Services Branch.

You must provide specific instructions detailing your wishes concerning the lawful disposition of the firearm. If such instructions are not received within 60 days of the notification from the Firearms Technology Industry Services Branch regarding the completion of our examination, the firearm will be considered abandoned and will be disposed of according to the needs of the Government.

For questions related directly to the evaluation or an evaluation status check please contact the Firearms and Technology Division at 304-616-4300 or via email at [fire\\_tech@atf.gov](mailto:fire_tech@atf.gov).

We trust that the foregoing information will be of assistance to you. Should you have further questions or concerns relative to this matter, please do not hesitate to call examiner [REDACTED] at [REDACTED] and refer to the nine-digit permit number located in the top right hand corner of this letter.

Sincerely yours,



Max M. Kingery  
Chief, Firearms and Explosives Imports Branch

ATF Supp 000771

U.S. Department of Justice  
Bureau of Alcohol, Tobacco, Firearms and Explosives

OMB No. 1140-0005 (12/31/2022)

### Application and Permit for Importation of Firearms, Ammunition and Defense Articles

Not for use by Members of the United States Armed Forces.

<b>For ATF Use Only</b>	<b>For Applicant's Optional Use</b>	
Permit No. (Valid for 24 months from the date appearing in Item 19 below.) NPR No. [REDACTED]	Internal Control/Reference # [REDACTED]	E-mail Address (Optional) [REDACTED]

**Section I - Application (Submit in triplicate) - For Applicant Use**

<b>1. Federal Firearms License (If Any)</b>		<b>2. Telephone No. (Including Extension No.)</b>	<b>3. Country of Exportation</b>
License No. (x-xx-xxx-xx-xx-xxxx) [REDACTED]	Expiration Date 11/01/2022	[REDACTED]	TURKEY
<b>4. Name and Address of Customs Broker (Including Zip Code)</b>		<b>5. Applicant's Name and Address (Including Zip Code)</b>	
[REDACTED]		[REDACTED]	
Check here if permit is to be returned to Customs Broker. <input type="checkbox"/>		Check here if permit is to be returned to applicant. <input checked="" type="checkbox"/>	
<b>6. Name and Address of Foreign Seller, if any</b>		<b>7. Name and Address of Foreign Shipper</b>	
[REDACTED]		[REDACTED]	

8. Description of Firearms and Ammunition (For firearms, enter (SG)-Shotgun; (R)-Rifle; (P)-Pistol; (RE)-Revolver; (DD)-Destructive Device; (MG)-Machinegun)											
	Name and Address of Manufacturer City and State or City and Country a.	Type (Frame, Receiver, SG, RL, PL, RE, DD, MG) b.	Caliber Gauge or Size c.	Quantity (Each type) d.	Unit Cost (U.S. Currency) e.	U.S. Munitions Import List Category f.	Model (required) g.	Length of Barrel (Inches) h.	Overall Length (Inches) i.	Serial No. j.	New (N) or Used (U) k.
Firearms	SEE ADDITIONAL SHEETS										
<input type="checkbox"/>	See Attachment										
Defense Articles	Description										
<input type="checkbox"/>	See Attachment										
Ammunition	Core Material (Lead, Steel etc.)	(Ball Wad-cutter, Shot, AP, Tracer) (Rounds)									
<input type="checkbox"/>	See Attachment										

10. Specific Purpose of Importation, Including Final Recipient, If Known (Use additional sheets, if necessary)  
RESALE

11. Are You Registered as an Importer Pursuant to The Arms Export Control Act of 1976 Yes  No

12. If "Yes," Give Importer's Registration No. and Expiration Date (A-xx-xxx-xxxx) [REDACTED]

Under the penalties provided by law, I declare that I have examined this application, including the documents submitted in support of it, and, to the best of my knowledge and belief, it is true, correct, and complete.

13. Name of Applicant (Printed) [REDACTED]

14. Signature of Applicant DIGITALLY SIGNED [REDACTED]

15. Title Partner

16. Date 06/02/2022

**Section II - For ATF Use Only (Please make no entries in this section)** SEE ATTACHED PAGE FOR RESTRICTIONS

17. The Application Has Been Examined and the Importation of the Firearms, Ammunition, and Defense Articles Described Herein is:

Approved  Disapproved for the Reason Indicated Here or on Attached Letter  Returned Without Action for Additional Information  Conditionally Approved

Partially Approved for the Reason Indicated Here or on Attached Letter  Withdrawn By Applicant Without Action  No Permit Required

18. Signature of the Director, Bureau of Alcohol, Tobacco, Firearms and Explosives [Signature]

19. Date 06/07/2022



**U.S. Department of Justice**  
Bureau of Alcohol, Tobacco, Firearms and Explosives

Permit No: [REDACTED]  
VALID FOR 24 MONTHS AFTER  
THE DATE OF APPROVAL

---

**RESTRICTIONS**

---

7	CONDITIONAL IMPORTATION PER ATTACHMENT . SEE LETTER ATTACHED (CBW, FTZ., FTISB EXAMINATION ETC.)
15	BUREAU OF ALCOHOL, TOBACCO, FIREARMS AND EXPLOSIVES - DEPARTMENT OF JUSTICE
19	NOTE: THIS IS TO CERTIFY THAT THIS IS A TRUE ATTACHMENT SHEET FOR THIS PERMIT.

[Redacted]

[Redacted]

11 August 2022

Director  
Bureau of Alcohol, Tobacco, Firearms and Explosives  
Attention: Firearms Technology Industry Services Branch  
244 Needy Rd  
Martinsburg, WV 25405  
(304) 616-4300

RE: Conditional Import [Redacted]  
ATF License: [Redacted]  
Model 1: [Redacted] - S/N  
Model 2: [Redacted] - S/N

[Redacted]

To Whom It May Concern:

Thank you in advance for your consideration in the requisite inspection of these new model firearms from [Redacted] in Turkey. As previously indicated on our Form 6 application, our intended use of these sporting pistols will be for resale.

In anticipation of favorable test results, after approval please notify me via the contact information listed herein. Upon completion of your evaluation, the most expedient method to ship the firearms to our company is to send via UPS Ground, billed to recipient. Our UPS ground account number is [Redacted]

If you have any questions or concerns regarding this matter, please do not hesitate to contact me. Again, thank you for your consideration, and I look forward to hearing from you.

Respectfully,

[Redacted Signature]

[Redacted]



**U.S. Department of Justice**

Bureau of Alcohol, Tobacco,  
Firearms and Explosives

*Firearm & Explosives Imports Branch*

---

*Martinsburg, WV*

[www.atf.gov](http://www.atf.gov)

June 7, 2022

901030:JH

5330 [REDACTED]

[REDACTED]

This is in response to your permit application dated, 02 June 2022, to import firearms into the United States.

The Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) was unable to determine the import status of the firearms described on your application from the information provided. The regulations (27 CFR 478.116) provide that the Director may authorize the conditional importation of a firearm for the purpose of examining and testing the firearm in order to determine the import status.

We have conditionally approved your permit application to allow you to import (1) [REDACTED] [REDACTED] pistol and (1) [REDACTED] [REDACTED] pistol to the Firearms Technology Industry Services Branch (FTISB) for an import evaluation. When submitting the firearm to ATF for examination and testing, please enclose the following documentation;

- (1) a copy of this letter and corresponding ATF Form 6 Part I permit;
- (2) manufacturers' information for the firearm;
- (3) the reason(s) for testing the firearm; and
- (4) any additional information that will assist FTISB in the examination and testing of the firearm.

-2-

[REDACTED]

This permit is authorized under the condition that the firearm be shipped under U. S. Customs and Border Protection supervision directly to the:

Director  
Bureau of Alcohol, Tobacco, Firearms and Explosives  
Attention: Firearms Technology Industry Services Branch  
244 Needy Road  
Martinsburg, WV 25405  
(304) 616-4300

If a determination is made that the firearm may not be imported, you have three alternatives:

- (1) destroy the firearm;
- (2) abandon the firearm to ATF or Customs; or
- (3) arrange for exportation of the firearm from the United States pursuant to an export license issued by the Office of Defense Trade Controls, Department of State, if existing U.S. Government policy does not preclude the issuance of a license for such exportation.

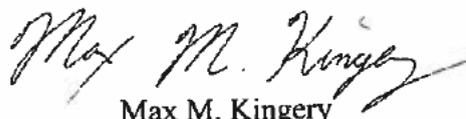
Samples may be shipped to ATF via FedEx, FedEx Ground or the United Parcel Service. All freight shipments and courier delivery shipments can only be received Monday through Thursday between 0800 and 1500 hours; or Friday 0800 to 1330. Please call the Firearms Technology Industry Services Branch at (304) 616-4300 should you need additional assistance. Do not ship any type of ordnance, explosives or hazardous materials to the Firearms Technology Industry Services Branch.

You must provide specific instructions detailing your wishes concerning the lawful disposition of the firearm. If such instructions are not received within 60 days of the notification from the Firearms Technology Industry Services Branch regarding the completion of our examination, the firearm will be considered abandoned and will be disposed of according to the needs of the Government.

For questions related directly to the evaluation or an evaluation status check please contact the Firearms and Technology Division at 304-616-4300 or via email at [fire\\_tech@atf.gov](mailto:fire_tech@atf.gov).

We trust that the foregoing information will be of assistance to you. Should you have further questions or concerns relative to this matter, please do not hesitate to call examiner [REDACTED] at [REDACTED] and refer to the nine-digit permit number located in the top right hand corner of this letter.

Sincerely yours,



Max M. Kingery  
Chief, Firearms and Explosives Imports Branch

ATF Supp 000777

U.S. Department of Justice  
Bureau of Alcohol, Tobacco, Firearms and Explosives

OMB No. 1140-0005 (12/31/2022)

### Application and Permit for Importation of Firearms, Ammunition and Defense Articles

Not for use by Members of the United States Armed Forces.

<b>For ATF Use Only</b>	<b>For Applicant's Optional Use</b>	
Permit No. (Valid for 24 months from the date appearing in Item 19 below.) NPR No. [REDACTED]	Internal Control/Reference #	E-mail Address (Optional) [REDACTED]

**Section I - Application (Submit in triplicate) - For Applicant Use**

<b>1. Federal Firearms License (If Any)</b>		<b>2. Telephone No. (Including Extension No.)</b>	<b>3. Country of Exportation</b>
License No. (x-xx-xxx-xx-xx-xxxx) [REDACTED]	Expiration Date 11/01/2022	[REDACTED]	TURKEY
<b>4. Name and Address of Customs Broker (Including Zip Code)</b> [REDACTED]		<b>5. Applicant's Name and Address (Including Zip Code)</b> [REDACTED]	
Check here if permit is to be returned to Customs Broker. <input type="checkbox"/>		Check here if permit is to be returned to applicant. <input checked="" type="checkbox"/>	
<b>6. Name and Address of Foreign Seller, if any</b> [REDACTED]		<b>7. Name and Address of Foreign Shipper</b> [REDACTED]	

**8. Description of Firearms and Ammunition (For firearms, enter (SG)-Shotgun; (R)-Rifle; (P)-Pistol; (RE)-Revolver; (DD)-Destructive Device; (MG)-Machinegun)**

	Name and Address of Manufacturer City and State or City and Country a.	Type (Frame, Receiver, SG, RI, PI, RE, DD, MG) b.	Caliber Gauge or Size c.	Quantity (Each type) d.	Unit Cost (U.S. Currency) e.	U.S. Muni- tions Import List Category f.	Model (required) g.	Length of Barrel (Inches) h.	Overall Length (Inches) i.	Serial No. j.	New (N) or Used (U) k.
Firearms	SEE ADDITIONAL SHEETS										
<input type="checkbox"/>	See Attachment										
Defense Articles	Description										
<input type="checkbox"/>	See Attachment										
Ammunition	Core Material (Lead, Steel etc.)	(Ball Wad-cutter, Shot, AP, Tracer) (Rounds)									
<input type="checkbox"/>	See Attachment										
a. Do not contain parts or components produced by or for the U.S. military and do not contain parts or components manufactured with U.S. military technical data or assistance. <input checked="" type="checkbox"/>											
b. Contain parts or components produced by or for the U.S. military or parts or components manufactured with U.S. military technical data or assistance. <input type="checkbox"/>											
c. Contain parts or components produced by or for the U.S. military or components manufactured with U.S. technical data or assistance that were sold abroad pursuant to a Direct Commercial Sale licensed by the Department of State. <input type="checkbox"/>											

**10. Specific Purpose of Importation, Including Final Recipient, If Known (Use additional sheets, if necessary)**  
RESALE

**11. Are You Registered as an Importer Pursuant to The Arms Export Control Act of 1976** Yes  No

**12. If "Yes," Give Importer's Registration No. and Expiration Date (A-xx-xxx-xxxx)**  
[REDACTED]

Under the penalties provided by law, I declare that I have examined this application, including the documents submitted in support of it, and, to the best of my knowledge and belief, it is true, correct, and complete.

**13. Name of Applicant (Printed)**  
[REDACTED]

**14. Signature of Applicant**  
DIGITALLY SIGNED

**15. Title**  
Partner

**16. Date**  
06/02/2022

**Section II - For ATF Use Only (Please make no entries in this section)** SEE ATTACHED PAGE FOR RESTRICTIONS

**17. The Application Has Been Examined and the Importation of the Firearms, Ammunition, and Defense Articles Described Herein is:**

Approved  Disapproved for the Reason Indicated Here or on Attached Letter  Returned Without Action for Additional Information  Conditionally Approved

Partially Approved for the Reason Indicated Here or on Attached Letter  Withdrawn By Applicant Without Action  No Permit Required

**18. Signature of the Director, Bureau of Alcohol, Tobacco, Firearms and Explosives**  
[Signature]

**19. Date**  
06/07/2022



**U.S. Department of Justice**  
Bureau of Alcohol, Tobacco, Firearms and Explosives

Permit No: [REDACTED]  
VALID FOR 24 MONTHS AFTER  
THE DATE OF APPROVAL

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**RESTRICTIONS**

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7	CONDITIONAL IMPORTATION PER ATTACHMENT . SEE LETTER ATTACHED (CBW, FTZ., FTISB EXAMINATION ETC.)
15	BUREAU OF ALCOHOL, TOBACCO, FIREARMS AND EXPLOSIVES - DEPARTMENT OF JUSTICE
19	NOTE: THIS IS TO CERTIFY THAT THIS IS A TRUE ATTACHMENT SHEET FOR THIS PERMIT.

From: [REDACTED]  
To: Hoffman, Daniel J  
Cc: [REDACTED]  
Subject: [EXTERNAL] [REDACTED] clarification request  
Date: Tuesday, December 13, 2022 11:58:20 AM  
Attachments: [REDACTED]

Dear Daniel:

I hope this finds you well. I am writing to see if you might be able to provide some clarification with respect to the treatment of the Locking Block Rail System (LBRS) used in certain models of [REDACTED] pistols in light of the new regulations defining the terms "frame" or "receiver" of a firearm.

As you may recall, [REDACTED] was approved to import [REDACTED] model pistols. These pistols use an LBRS which is attached (pinned) to a polymer grip frame. The LBRS is not marked, but the grip frame is marked with a serial number on a metal plate embedded into the frame.

Later, [REDACTED] submitted [REDACTED] model pistols for import classification. These pistols use the same LBRS as the [REDACTED] and [REDACTED] models. While ATF approved the [REDACTED] for import, for the first time, ATF determined that the LBRS as used in the [REDACTED] is the receiver of the pistol, and therefore informed [REDACTED] that the LBRS was required to be properly marked with a serial number.

When this discrepancy was pointed out, ATF allowed [REDACTED] to mark the same serial number on the LBRS and on the polymer grip module (embedded in a metal plate) on the [REDACTED] models. ATF also allowed [REDACTED] to continue to distribute [REDACTED] and [REDACTED] model pistols marked as they always have been (i.e., with only a serial number on a metal plate embedded into the grip frame) until the expiration of those model's product life. I have attached correspondence between ATF and [REDACTED] regarding the foregoing (3/5/2020 letter from Mike Curtis to [REDACTED]) for your information.

As part of [REDACTED] integration into the [REDACTED], we are now looking to manufacture [REDACTED] pistols at our [REDACTED] location. To improve manufacturing efficiency and standardize compliance, it would be advantageous to be able to treat all LBRS modules as used in these [REDACTED] models the same. Under the new regulations, "[t]he term 'frame' means the part of a handgun, or variants thereof, that provides housing or a structure for the primary energized component designed to hold back the hammer, striker, bolt, or similar component prior to initiation of the firing sequence (i.e., sear or equivalent), even if pins or other attachments are required to connect such components to the housing or structure." § 478.12(a)(1). Based on this definition, I think you might agree that the grip module of these [REDACTED] model pistols is actually the "frame" because it (the grip module) provides the housing or structure for the primary energized component designed to hold back the striker prior to initiation of the firing sequence (not the LBRS).

We would like to get written clarification to avoid any confusion going forward given the previous correspondence from ATF. Let me know if that would be possible or if you would like to discuss this matter further.

Very respectfully,

- [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED] [REDACTED]

**CONFIDENTIALITY NOTICE**  
This email and any files transmitted with it are confidential and solely for the use of the intended recipient. It may contain information that is covered by legal, professional or other privilege. In addition, it may contain technical data as defined in the International Traffic in Arms Regulations (ITAR) 22 CFR 120.10. Export of this material is restricted by the Arms Export Control Act (22 U.S.C. 2751 et seq.) and may not be exported or transferred to non-U.S. persons without prior written approval from the U.S. Department of State. If you are neither the intended recipient of this email nor the person responsible for delivering it to the intended recipient, be advised that you have received this email in error and that any use of it is strictly prohibited. Please notify the sender immediately by reply email and then delete it from your system.



324620

12/23/2022

ATF Import Permit [redacted]

ship (

Director  
Bureau of Alcohol, Tobacco, Firearms and Explosives  
Attention: Firearms Technology Industry Services Branch  
244 Needy Road  
Martinsburg, WV 25405

Re: [redacted] PRE-FRAME

Dear ATF,

This letter is a request for a evaluation and classification of [redacted] PRE-FRAME" [redacted]  
[redacted] would like to import the unfinished frame from our [redacted] The  
unfinished frame once imported would be finished to a complete 100% status at [redacted]  
[redacted]

The unfinished frame once imported would be resold for manufacturing.

If you have any questions please feel free to contact me.

Thank you for your time and consideration.

Sincerely,





U.S. Department of Justice

Bureau of Alcohol, Tobacco,  
Firearms & Explosives



*Firearms & Explosives Imports Branch*

[www.atf.gov](http://www.atf.gov)

December 22, 2022

901030: CES

3311 [REDACTED]

[REDACTED]

Dear Applicant:

This is in response to your permit application dated November 29, 2022, to import (500,000) [REDACTED] pre-frames [REDACTED] into the United States.

The Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) was unable to determine the import status of the defense articles described on your application from the information provided. Federal regulations at Title 27 CFR 478.116 and 478.113 provide that the Director may authorize the conditional importation of a defense article for the purpose of examining and testing the defense article in order to determine the import status.

We have conditionally approved your permit application to allow you to import (1 [REDACTED] [REDACTED] pre frame model [REDACTED] to the Firearms Technology Industry Services Branch (FTISB) for an import evaluation. When submitting a defense article to ATF for examination and testing, please enclose the following documentation:

- (1) a copy of this letter and corresponding ATF Form 6 Part 1 permit;
- (2) manufacturers' information for the defense article;
- (3) the reason(s) for testing the defense article; and
- (4) any additional information that will assist FTISB in the examination and testing of the defense article.

This permit is authorized under the condition that the defense article be shipped under U. S. Customs and Border Protection supervision directly to the:

-2-



Director  
Bureau of Alcohol, Tobacco, Firearms and Explosives  
Attention: Firearms Technology Industry Services Branch  
244 Needy Road  
Martinsburg, WV 25405  
(304) 616-4300

If a determination is made that the defense article may not be imported, you have three alternatives:

- (1) destroy the defense article;
- (2) abandon the defense article to ATF or Customs; or
- (3) arrange for exportation of the defense article from the United States pursuant to an export license issued by the Office of Defense Trade Controls, Department of State, if existing U.S. Government policy does not preclude the issuance of a license for such exportation.

Samples may be shipped to ATF via FedEx, FedEx Ground or the United Parcel Service. All freight shipments and courier delivery shipments can only be received Monday through Thursday between 0800 and 1500 hours; or Friday 0800 to 1330. Please call the Firearms Technology Industry Services Branch at (304) 616-4300 should you need additional assistance. Do not ship any type of ordnance, explosives or hazardous materials to the Firearms Technology Industry Services Branch.

You must provide specific instructions detailing your wishes concerning the lawful disposition of the defense article if the firearm is determined to be non-importable. If such instructions are not received within 60 days of the notification from the Firearms Technology Industry Services Branch regarding the completion of our examination, the defense article will be considered abandoned and will be disposed of according to the needs of the Government.

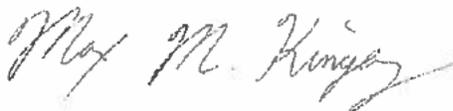
For questions related directly to the evaluation or an evaluation status check please contact the Firearms and Ammunition Technology Division at 304-616-4300 or via email at [fire\\_tech@atf.gov](mailto:fire_tech@atf.gov).

-3-

[REDACTED]

We trust that the foregoing information will be of assistance to you. Should you have further questions or concerns relative to this matter, please do not hesitate to call Examiner [REDACTED] at [REDACTED] and refer to the nine-digit permit number located in the top right hand corner of this letter.

Sincerely yours,



Max M. Kingery  
Chief, Firearms and Explosives Imports Branch

U.S. Department of Justice  
Bureau of Alcohol, Tobacco, Firearms and Explosives

OMB No. 1140-0005 (12/31/2022)

### Application and Permit for Importation of Firearms, Ammunition and Defense Articles

Not for use by Members of the United States Armed Forces.

<b>For ATF Use Only</b> Permit No. (Valid for 24 months from the date appearing in Item 19 below.) NPR No.	<b>For Applicant's Optional Use</b> Internal Control/Reference # E-mail Address (Optional)	

**Section I - Application (Submit in triplicate) - For Applicant Use**

1. Federal Firearms License (If Any) License No. (A-YY-XXV-XX-XX-XXXX) Expiration Date [Redacted] 04/01/2023	2. Telephone No. (Including Extension No.) [Redacted]	3. Country of Exportation KOREA REPUBLIC OF
4. Name and Address of Customs Broker (Including Zip Code) [Redacted]		5. Applicant's Name and Address (Including Zip Code) [Redacted]
Check here if permit is to be returned to Customs Broker. <input type="checkbox"/>		Check here if permit is to be returned to applicant. <input checked="" type="checkbox"/>
6. Name and Address of Foreign Seller, if any [Redacted]		7. Name and Address of Foreign Shipper [Redacted]

**8. Description of Firearms and Ammunition (For firearms, enter (SG)-Shotgun; (RI)-Rifle; (PI)-Pistol; (RE)-Revolver; (DD)-Destructive Device; (MG)-Machinegun)**

	Name and Address of Manufacturer City and State or City and Country		Type (Frame, Receiver, SG, RI, PI, RE, DD, MG)	Caliber Gauge or Size	Quantity (Each type)	Unit Cost (U.S. Currency)	U.S. Munitions Import List Category	Model (required)	Length of Barrel (Inches)	Overall Length (Inches)	Serial No.	New (N) or Used (U)
	a.		b.	c.	d.	e.	f.	g.	h.	i.	j.	k.
Firearms	<input type="checkbox"/> See Attachment											
Defense Articles	[Redacted]				Requested: 0 Granted: 1		(a)	Description SEE ATTACHED OVERFLOW PAGE				
Ammunition		Core Material (Lead, Steel, etc.)	(Ball Wad-cutter, Shot, AP, Tracer) (Rounds)									
9. Certification of Origin. The items sought for importation in block 8: <ul style="list-style-type: none"> <li>a. Do not contain parts or components produced by or for the U.S. military and do not contain parts or components manufactured with U.S. military technical data or assistance. <input checked="" type="checkbox"/></li> <li>b. Contain parts or components produced by or for the U.S. military or parts or components manufactured with U.S. military technical data or assistance. <input type="checkbox"/></li> <li>c. Contain parts or components produced by or for the U.S. military or components manufactured with U.S. technical data or assistance that were sold abroad pursuant to a Direct Commercial Sale licensed by the Department of State. <input type="checkbox"/></li> </ul>												

10. Specific Purpose of Importation, Including Final Recipient, if Known (Use additional sheets, if necessary)  
**RESALE**

11. Are You Registered as an Importer Pursuant to The Arms Export Control Act of 1976 Yes  No

12. If "Yes," Give Importer's Registration No. and Expiration Date (A-xx-xxx-xxxx)  
 [Redacted]

Under the penalties provided by law, I declare that I have examined this application, including the documents submitted in support of it, and, to the best of my knowledge and belief, it is true, correct, and complete.

13. Name of Applicant (Printed) [Redacted]	14. Signature of Applicant DIGITALLY SIGNED [Redacted]	15. Title Compliance Officer	16. Date 11/29/2022
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**Section II - For ATF Use Only (Please make no entries in this section) SEE ATTACHED PAGE FOR RESTRICTIONS**

17. The Application Has Been Examined and the Importation of the Firearms, Ammunition, and Defense Articles Described Herein is:

Approved <input type="checkbox"/>	Disapproved for the Reason Indicated Here or on Attached Letter <input type="checkbox"/>	Returned Without Action for Additional Information <input type="checkbox"/>	Conditionally Approved <input checked="" type="checkbox"/>
Partially Approved for the Reason Indicated Here or on Attached Letter <input type="checkbox"/>	Withdrawn By Applicant Without Action <input type="checkbox"/>	No Permit Required <input type="checkbox"/>	

18. Signature of the Director, Bureau of Alcohol, Tobacco, Firearms and Explosives  
 [Signature]

19. Date  
 Branch Chief 12/23/2022

**U.S. Department of Justice**  
Bureau of Alcohol, Tobacco, Firearms and Explosives

Permit Number: [REDACTED]

Internal Control Number: [REDACTED]

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**OVERFLOW PAGE**

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Defense Articles - PRODUCT TYPE is FIREARM PARTS : PRE-FRAME PER 27CFR 447.22 [REDACTED]

U.S. Department of Justice  
Bureau of Alcohol, Tobacco, Firearms and Explosives

Permit No [REDACTED]  
VALID FOR 24 MONTHS AFTER  
THE DATE OF APPROVAL

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**RESTRICTIONS**

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7	CONDITIONAL IMPORTATION PER ATTACHMENT SEE LETTER ATTACHED (CBW, FTZ., FTISB EXAMINATION ETC.)
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324648

[REDACTED]

[REDACTED]

[REDACTED]

12/29/2022

ATF  
Firearms and Ammunition Technology Division  
244 Needy Road  
Suite 1600  
Martinsburg, West Virginia 25405

To Whom It May Concern:

We are submitting the enclosed item for classification under the Gun Control Act of 1968 (GCA).

The item is pictured below. This item would only be offered "as pictured".

We are politely requesting a determination from the ATF that this item is NOT a "firearm receiver or firearm".

Sincerely,

