

Department of Justice
Alcohol, Tobacco, Firearms and Explosives
Supporting Statement
Information Collection Request 1140-0090
Federal Firearms License (FFL) RENEWAL Application
ATF F 8 (5310.11) Part II

A. Justification

1. Title 18 of the United States Code, Chapter 44 (18 U.S.C. Chapter 44) provides that no person may engage in the business of importing, manufacturing, or dealing in firearms, or importing or manufacturing ammunition without first obtaining a license to do so. The benefit of a collector's license is also provided for in the statute. These activities are licensed for a specific period of time. In order to continue uninterruptedly in these activities, licenses can be renewed by filling out a renewal application prior to its expiration.
2. The information on this renewal application form is used by ATF application examiners to identify the applicant for a renewed firearms license and to determine that the applicant remains eligible to retain the license. The form is filed by the licensee desiring to renew their Federal firearms license. As stated, it is used to identify the applicant, locate the business/collection premises, identify the type of business/collection activity, and determine the eligibility of the applicant. The renewal application for a Federal Firearms license (also known as FFL) is used by the public to retain a license to engage in Firearms activities; i.e. deal, collect, manufacture, and import firearms

As long as 18 U.S.C. 923 requires a person wishing to 'engage in business' to pay a fee, to file an application, and to obtain a license before engaging in business or collection activity of curio and relics, this form or one like it will be necessary.

Without the information supplied by the applicant on the renewal form, ATF might issue a renewal to a person prohibited by law from engaging in the business or collecting.

3. ATF F 8 (5310.11) Part II is generated out of the ATF Federal Firearms Licensing Center in Atlanta, Georgia. The form is not available on the ATF website because it is populated (special data base which has specific information on each applicant) for each renewal applicant. The form cannot be faxed because the renewal fee (several options to pay) and an original signature must be submitted by mail to the licensing center.

4. ATF uses a uniform subject classification system to identify duplication and to ensure that similar information already available cannot be used or modified for use for the purpose of this information collection.
5. The collection of information has no impact small business or other small entities.
6. Less frequent collection of this information collection would pose a threat to public safety.
7. There are no special circumstances regarding this collection. The collection is conducted in a manner consistent with 5 CFR 1320.6.
8. The ATF industry liaison was involved with the creation of this information collection. A 60-day and 30-day Federal Register Notice was published in order to solicit comments from the public. No comments were received.
9. No payment or gift is associated with this collection.
10. No confidentiality is assured. Information regarding the renewal applicants is kept in a secured location at the ATF Federal Firearms Licensing Center.
11. Questions of a sensitive nature are asked on the renewal application in order to determine the eligibility of the applicant.
12. There are 35,000 respondents for this collection. Each respondent responds 1 time. Total annual responses is 35,000. Total time to complete the form is 25 minutes. Total annual burden hours is 14,700.
13. The cost to the respondent is the mailing of the form to the ATF National Licensing Center. There is no capital/startup cost. The total annualized cost for this information collection is \$12,950.00.
14. The estimated annual cost to the Federal Government of collecting and processing the information collected through the use of this information collection request is as follows:

Printing	\$1,000
Distribution	\$1,000
Clerical cost	\$35,750
Postal cost	<u>\$12,950</u>
	\$50,700

15. There are no changes or adjustments associated with this information collection.

16. The results of this collection will not be published.

17. ATF does not request approval to not display the expiration date of OMB approval for this collection.

18. There are no exceptions to the certification statement.

B. Collections of Information Employing Statistical Methods.

None