

Date:	ATF FORM 4473		
Comment From:	Comment	Justification for Comment	Accept or Deny Comment
6/25/08 Matt French Sportsman's Warehouse	(via email) (1) change color of form	To assist those using the form and ATF Distribution Center	Accepted will change color
	(2) transferee's (buyer's) telephone number	To assist FFL dealers when the need arises to contact the customer should there be a product recall or an error on the form after the transfer	Accepted , A new block 30c has been added for any optional information.
	(3) segregate question 12 (if you are a nonimmigrant alien)	Segregate either by creating a unique border around the question or by printing the comments "If question 11.l. is answered with a "no" response, THEN DO NOT complete question 20.d.)" in all bold capital letters	Accepted comment to bold THEN DO NOT
	(4) anywhere date is required incorporate the format MM/DD/YYYY or utilize the same format as question 7 (Month/Day/Year)		Accepted and made necessary change for 21a.
	(5) question 18 - please include the language "check all that apply"	A transferee may be purchasing one or more of each type	Accepted and incorporated "check all that apply" 18.

	(6) question 18 – please omit the word “frame” from the type selection of other firearm	Receiver is already listed and we believe is already listed and more accurately describes a firearm with no barrel assembly	Denied comment; Frame is in regulations definition Frame or Receiver 921a(3).
	(7) question 20- please rephrase to read “alternate government issued document if driver’s license or other identification document does not show current residence address”	This is necessary to satisfy ATF Ruling 2001-5	Accepted and reworded 20a (Identification (e.g. Virginia Drivers License (VA DL) or other valid government-issued photo identification.) (See instructions for Question 20.a.)
	(8) question 29- please omit the word frame from the type selection	Receiver is already listed and we believe is already listed and more accurately describes a firearm with no barrel assembly	Denied comment; Receiver is already listed and we believe is already listed and more accurately describes a firearm with no barrel assembly
6/20/08 Mary Jo Hughes	(via email) (1) Suggestions will not result in any	They will be much more noticeable and serve to	Denied comment for the revision of

DIO – St. Paul	changes to the form, the comments are highlighted in red and capitalized and bolded section headings and move section headings to the left	fully draw the FFL's and purchaser's attention to these various categories	this form; this will cause extensive formatting changes, and were currently to close to the deadline of having form completed; will take this comment into consideration for next renewal of form.
6/13/08 Mark Buda Triple Break Products	(via email) (1) Conflicting directions – the directions specify for question 11 – check yes or no, 11.1. tells you not to fill out question 12 even though directions for 11 say you must do so		Accepted comment, reworded 11. Answer questions 22.a. (see exceptions) through 11.1. and 12 (if applicable) by checking or marking “yes” or “no” in the boxes to the right of the questions.
	(2) question 11.1. take out “may proceed”	Clarify by making change “and proceed”	Accepted comment and

			incorporated change.
	(3) Currently the directions are ambiguous and cause major confusion when someone falls into the “do not fill out question 12” as directed by question 11.1., but directions for 11 you must fill out.		Accepted , reworded 11. Answer questions 22.a. (see exceptions) through 11.1. and 12 (if applicable) by checking or marking “yes” or “no” in the boxes to the right of the questions.
	(4) put the signature and date area (question 16 and 17) to be signed by buyer on page one	It makes it much easier to go through when going through an inventory audit.	Denied , could not accept this comment due to printing issues with ATF (document services); also this would cause formatting issues to the form.
	(5) question 20.a. – provide more room	This is needed when two or more items of identification are needed – there is not enough room for the additional information.	Accepted , incorporated additional space.
	(6) put back the area to write down the person you communicated with (no question provided we believe he is writing about what used to be question	This can be important when follow up communication is needed with the State (not NICS) approval person and	Accepted , A new block 30c has been added for any optional

	21.f. re: NICS examiner name and number)	complex verification of buyer's identification documents.	information.
	(7) Signify what questions must be filled in and what questions are optional.		Accepted, A new block 30c has been added for any optional information.
	(8) Question 2 – address block not big enough for a long street/road name.	It needs to be larger.	Accepted, incorporated additional space.
	(9) Add text for question 9 (Unique Personal Identification Number) that it is optional.		Accepted, A new block 30c has been added for any optional information.
6/13/08 FBI NICS USER'S CONFERENCE (REC. by Eric Epstein)	(1) Add language that purchaser is not relieved from any State law (specifically "lying and buying" –they have used the form 4473 in State cases)		
6/18/08 Barbara Wright Cherry Roads	(1) Inquired whether a determination was made on the size of the form – is it changing to an 8 ½" x 11" or is it remaining 8 ½" x 33"?		Response: The electronic version will be the smaller size (8 ½" x 11") the hard copy will

			remain the same (continuous 8 ½” x 33”)
6/17/08 DAD Stucko received a comment from Wally Nelson	(1) question 11.l. change to read “and proceed” [remove “and may proceed”]		Accepted, changed to read “and proceed”
5/28/08 (received 6/3/08 Robert G. Marcus President Virginia Firearms Dealers Association	(1) With each new edition of the form the complexity increases and friendliness to firearm seller and consumer decreases	(synopsis)Form is outdated and should not be revised, but rather replaced.	Reviewed comment. Will not incorporate any changes, this is the individuals personal opinion and ATF has responded by form letter stating that we have taken this comment into consideration.
	(2) Add statement directly under the lines that begin “prepare in original only” on page 1 – “Unless otherwise noted, this transaction this represents a firearms sale or transfer:___ Pawn Redemption ___ Repair pick up __ Return of a Consignment	We propose that it is the task of the dealer to indicate the transaction type if necessary when furnishing the form to the consumer.	Denied, did not incorporate due to time constraints, will consider incorporating in next renewal of

			form.
	(3) question 11.a. allows the boxes to remain unchecked if a repair is picked up by a person other than the owner; however, there is no provision on the form to indicate such a transaction has taken place	Without that information in the form, the lack of an answer to 11.a. could be misconstrued as an oversight for which a dealer may be cited unnecessarily and inappropriately.	Reviewed comment and determined this is clarified in the Instructions: “if you are picking up a repaired firearm(s) for another person, you are not required to answer 11.a. and may proceed to question 11.b.
	(4) by noting pawn redemptions at the beginning of the transactions (see note 2 above) the question at 30.b. would be eliminated. Requiring the vast majority of dealers who are not in the pawn business to indicate the transaction does not involve pawn redemptions is unusual.		Reviewed comment; this was moved to the back of the form by ATF Counsel to be consistent with Section D which outlines the information the seller must document for the purchasing of a firearm.
	(5) question 2 – is unnecessary because the block for State is barely large enough to right Ohio or Iowa.	Block 2 is unnecessary because block is too small for anything other than two letters.	Reviewed comment. question 2 states the buyer can use U.S. Postal

			abbreviations. Therefore will fill this block has sufficient space.
	(6) question 3 – should the words read “U.S. city/state or district?”	To accommodate for the District of Columbia.	Denied , revised form to reflect – OR- Foreign Country.
	(7) question 3 - Should the words “foreign country” be changed to “foreign country/U.S. territory or possession”?		Denied , revised form to reflect – OR- Foreign Country.
	(8) question 7 – other areas of the form require a date use the format MM/DD/YYYY	For consistency couldn’t it be used for this question as well?	Accepted , revised and made necessary change for 21a
	(9) question 12 – the “11.1.” looks remarkably like a number one “1” instead a letter “l”	Is it possible to change the order of the question or use capital letters to avoid confusion by our customers who have trouble recognizing the lower case “l” from the numeral “1”?	Reviewed comment , could not change this due to type set of print.
	(10) question 18 (type of firearm(s) to be transferred) – This should be eliminated.	The information is already available under block 29 type and what difference does it make if the item is a long gun, frame, receiver, handgun, or other? Anything that necessitates using the 4473 form is consider a firearm.	Denied , type has to be let in question 18-29, this is used by NICS must have a description of firearm.
	(11) question 20.a. (identification)		Reviewed

	Not comfortable in writing the date.		comment, spacing for date will remain the same. Cannot input more space.
	(12) question 21.a. (NICS date) Not enough room to write the date, practically the block is full of instructions.		Accepted, revised and made necessary change for 21a
	(13) block 30.a. (total number of firearms) A wonderful idea that is completely unworkable except to create an additional task for millions of unlawful firearms seller who are not pilfering inventory or attempting to account for lost or missing firearms. There is no oversight by the customer when this portion of the form is filled out. So for someone with larceny in his heart he simply waits till the customer leaves adds whatever else he wants to under block 26-30 and then writes the number of firearms covered by this 4473 form in block 30.a. We are completely opposed to this additional burden because if a person is going to steal or conceal mistakes then he most likely will falsify the form as well.		Reviewed comment; will not incorporated any changes, this is the individuals personal opinion and ATF has responded by form letter stating that we have take this comment into consideration.
5/27/098 (received 6/3/08)	(1) Likes the new Yes/No check boxes in question 11.		ATF has reviewed

James M. Cannon Cannon Enterprises			comment.
	(2) Suggest you list “bi-racial/other” block on question 10 (race/ethnicity)		Denied, According to Linda Barnes (Docs Services) we must keep required race/ethnicity information as prescribed by OMB.
	(3) Keep “both” block on question 18 (type of firearms)		Denied, ATF Counsel recommended that both be changed to other firearms (Frame, Receiver, etc.) to give a complete definition of other types of firearms that may be purchased.
5/8/08 Rob Brechmann Owner of Breco Enterprises	(1) E-4473 will be a winner for ATF inspectors and FFL dealers. If done correctly, the time saved and the reduction of paper products could be paramount to business owners and the environment.		Reviewed comment; an electronic version is being developed. However, the

			form will still be required to be printed out and retained.
5/27/08 Yvonne Evanoff- Joseph Classic Arms Co. Inc.	(1) The form is too lengthy. Initially the form was one page and is now a three page form. All pertinent information, including signature of buyer should be on the front page.	This would help to alleviate the problem of omitting the buyer's signature and date.	Denied, Document Services – could not move this to the first page.
	(2) There needs to be clarification of the following questions: 11.c. should clarify whether the felony or crime was expunged.	Buyer's are often confused and feel they are not being truthful when answering this question.	Denied, already incorporated in instruction under Exceptions 11c.
	(3) question 12 – needs to be rewritten for clarification purposes		Accepted, 11 instructions were reworded.
	(4) I question why “y” or “n” does not suffice for answering the question (questions in 11)	This is often times a point where compliance officers will issue violations for the incorrect verbiage. This use of “y” or “n” is universally known.	Reviewed, and ATF's position is that answers with only “y” or “n” can be misunderstood or illegible. Blocks changed to allow checking or marking a “yes” or “no” answer.
	(5) As to the use of electronic and technological collection techniques this is		Reviewed, forwarded a

	<p>ill suited to small independent operations. I have seen demonstrations of some of the commercial programs recently the problem exists that some of the buyers of firearms are functionally illiterate. They require additional help in filling out the present form. It is not uncommon to find people that cannot write. Any electronic device would require this skill in addition to the ability to input personal information. In busy situations, this would cause added delays for processing sales. Secondly, the cost of such a device is a concern for small dealers. Since having several terminals would be prohibitive.</p>		<p>routine letter stating we have taken his comment into consideration.</p>
<p>5/6/08 Denton Bramwell</p>	<p>(1) Form 4473 presents unnecessary questions. And presents questions in a way to invite errors. The following changes will reduce the probability of error and reduce the amount of paperwork required without compromising the information that must be collected to comply with the law. Block 2 -purchaser's county of residence in implicit in the city and zip code information. Eliminate the request for the purchaser's county.</p>		<p>Denied, ATF opinion is that counties can be in multiple cities and zip codes.</p>
	<p>(2) No legal requirement to be of some particular race or to declare your race in</p>		<p>Denied, ATF's opinion is while</p>

	<p>order to purchase a firearm. While someone might find this information useful or interesting, I do not believe it is required. This block might be eliminated all together. Also see comment D.</p>		<p>there is no requirement, the purchaser has to provide information on their identity to the seller (which includes photo identification) and the information is used by the FBI NICS and/or State POCs in order to determine if a person is prohibited.</p>
	<p>(3) Question 13 - Purchaser's state of residence is requested in block 2 this question is redundant and should be eliminated. "If you are not a citizen" issue can be handled as instructions in Block 2</p>	<p>According to David Hardy, an attorney who is one of the country's leading expert on firearms laws [he quotes law]</p>	<p>Denied, at this time block 2 and 13 have to be answered by buyer.</p>
	<p>(4) Reference Blocks 4 (height), block 5 (weight) and block 6 (gender) and block 7 (date of birth) Address/Place of birth and Date of Birth are sufficient to distinguish different individuals who happen to have the same name. Blocks 4, 5, and 6 can be eliminated. Block 7 should have instructions on the acceptable format for date of birth.</p>	<p>The right to purchase firearms is not limited to persons of particular height, weight, or gender.</p>	<p>Denied, this information is necessary for the FBI NICS Background Checks.</p>

	(5) Blocks 4, 5, and 6 might be helpful to law enforcement if a firearm is associated with a crime, but it is unreasonable to request this information of everyone just in case they commit a crime someday.		Denied , this information is necessary for the FBI NICS Background Checks.
	(6) Block 20 (identification) requires government issued photograph identification which quickly leads to the same information, plus a photograph.		Reviewed comment , this information is necessary for FBI NICS Background Checks
	(7) Block 11 (certification questions) this section is poorly structured. It is peculiar that ATF requires the purchaser to fill out the boxes with a full yes or no instead of a “y” or “n”, while other branches of the government are perfectly willing to accept ballots where the intent of the voter can be discerned.		Denied , ATF determined the yes and no boxes would be helpful to the dealer and ATF inspectors, this would help to eliminate dealers being cited for violations due to the inspection not being able to determine what the buyer has written for y or n and it would help the inspectors clearly identify if the purchaser marked yes or no.

	<p>(8) Potential error can be reduced by restructuring box 11 {commenter provided 8 examples (with etcetera) for prohibiting categories...such as “The dealer cannot transfer the firearm to you if any of the following are true: If you are not the actual purchaser of the firearm....[then commenter has a question which reads] “According to the restrictions stated here, is the dealer legally allowed to transfer the firearm to you [place and “x” in the correct box—yes and no and blocks for each shown]</p>		<p>Denied, ATF, opinion with this current structure most of the opportunity for error is eliminated, and required declarations are all made.</p>
	<p>(9) Perhaps some of the other declarations, such as age, could be incorporated in this block [which was the list of prohibiting categories listed above]</p>		<p>Denied, ATF opinion is the current structure most of the opportunity for error is eliminated, and required declarations are all made.</p>
	<p>(10) Collection of the required information can be greatly facilitated by electronic means. Adobe Acrobat produces documents (pdf) that can be read on all types of computers. The same software provides for user in interactive forms. Form 4473 could be reduced to a universal readable electronic form, which purchasers could download electronically complete, print, sign, and carry with them</p>	<p>This would be particularly helpful to those who make more than one transaction while living at a particular residence, since a single form could be stored and reprinted as needed.</p>	<p>Denied, ATFs is currently working on it’s own specific electronic E-version of the 4473.</p>

	to their intended purchase.		
5/14/08 Douglas Lemm Unique Outdoor Enterprises, Inc.	(1) Serious reservations of ATF to adopt any electronic version of ATF Form 4473.	Regardless of how many proposed safeguards could and should be used to protect the confidentiality of that information from unintended access and use, the potential for privacy will still be too great to ignore. Therefore, I am strongly opposed to any such proposal, voluntary or mandatory to institute or even to test any such method or systems. Please do not waste the time (yours or ours) or the Money (yours or ours) tax dollars on such proposals.	Denied , ATF will implement and electronic version of the 4473.
U.S.P.O. stamped 6/2/08 James Brian Hehl	(1) Question 11 – have customer continue to write “yes” or “no”		Denied , ATF determined the yes and no boxes would be helpful to the dealer and ATF inspectors, this would help to eliminate dealers

			being cited for violations due to the inspectors not being able to determine what the buyer has written for y or n and it would help the inspectors clearly identify if the purchaser marked yes or no.
5/5/08 Barry Laws, CEO, Openrange	(1) ATF F 4473 process infringes on my business. I do not get paid for working for the government plus I take all the liability for the forms.		Reviewed comments, and forwarded a routine letter stating we have taken the comments into consideration.
	(2) There are many pitfalls in the form where my liability is open.		
	(3) The forms from start to finish, take about 10 minutes of my time or my staff's time. Again, I'm not compensated for this		
	(4) I feel one check of ID is as much as I should have to process any sale. I feel a federal firearm purchase ID would		

	streamline my work.		
	(5) Gun sales have some of the smallest margins in retail. A normal retail sale has about 40% margin. A gun sale is 12% to 15%. I realize selling guns is my choice yet the added burden of NICS checks should be reconsidered as it further cuts into my profits.		
	(6) We need a streamlined system to process. It simply takes too much time to process, plus I am the bearer of bad news if a customer doesn't pass. This creates ill will with my customers.		
5/14/08 Dale Seieroe Owner Dale's Guns	<p>(1) Electronic 4473; Do not believe that the E4473 would be a good direction to go in. 1). Computers are too easy to hack into 2). Computers are notorious for going down just at the busiest time of the day. 3). Security is a huge problem there is no way to make these sites secure enough. 4). No matter how it is worded I still believe that this is a back door gun registration.</p> <p>(2) Has no problem with the current ATF 4473 form.</p>		Reviewed comment, ATF will implement an electronic version of the 4473.

5/31/08 Richard R. Harris Owner, Firearms Sales Co., LLC	(1) Does like the idea of the purchaser being able to enter a check mark in the yes or no block.		Reviewed comment. Will not incorporated any changes, this is the individuals personal opinion and ATF has responded by form letter stating that we have taken this comment into consideration.
	(2) Need to add a question to the front of the form, not the back, which addresses the issue of whether the purchaser is buying the firearm for themselves or a legitimate gift.		Denied, will consider upon the next renewal of form. This form is in its final stage, and major changes would delay producing the form on time.
	(3) Capitalize the letters, A thru L under question 11 as many of our customer's mistake 11.1. as the number 1.		Denied, this will affect the formatting of the form and This form is in its final stage, and major changes would delay producing

			the form on time.
	(4) Question 11.k. asks if you are an alien illegally in the United States. to me that would mean someone who has entered the U.S. illegally and is not a U.S. citizen. Some customers ask for a definition. Perhaps some additional explanation would help.		Denied , this is explained in the instructions.
	(5) I ask that ATF require the manufacturer and/or importer to make sure this information on the firearm is legible. On many you need a magnifying glass because the stamping is too small or stamped too lightly. This also applies to the serial number.		Denied , regulations require certain markings by manufactures or importers.
	(6) Block 18 Section B type of firearm, Is not a shotgun with an 18” or long barrel with a pistol grip still considered a long gun? Or are you referring to a firearm classified as any other weapon.		Accepted , this is addressed in question 18 Instruction.
	(7) It is my belief that ambiguity should be removed from the 4473. Under Section B. Know Your customer it is stated that the buyer “MUST” provide a valid government issued photo I.D. to the seller that contains the buyer’s name, “residence address”, & date of birth, Yet if also states that a combination of government issued documents may be provided. How can you have it both ways.	Please note that in VA a purchaser must have a primary and a secondary I.D. the primary I.D. is the Virginia Drivers license or photo I.D. issued by the Division of Motor Vehicles. The second I.D. must contain a name address and must be the exact name and address as appears on the primary form of I.D. However you can not use a	Reviewed comment , the types of acceptable identification is addressed in the instructions 20a.

		Virginia driver's license in combination with a DMV photo I.D. Nor can it be a combination of documents as the 4473 suggest. I've always been told by ATF that the stricter requirement prevails. In this case I believe that to be VA.	
	(30c) It should be apparent to anyone that can count that there are 5 spaces on the 4473 in which to list the number of firearms purchased. If more than 5 are purchased they are then listed on a separate sheet attached to the 4473 which we are required to keep for at least (20) years. In my opinion, 30c is redundant.		Reviewed comment, block 30c was added for the FFL use to provided any additional information he/or she deem appropriate regarding the transaction (sale of the firearm)
5/5/08 Gary Marbut President, Montana Shooting Sports Association, Inc.	(1) Concern that ATF has required FFLs to obtain a residence address from firearm purchaser as a condition of firearm sale completion on their form 4473. (2) I find the requirement for a firearm purchaser to provide a residence address (not a postal address to be printed on the	Law enacted by Congress allows the ATF to require only an address from a person purchasing a firearm from a federally-licensed dealer, no more. The Montana Supreme Court has determined that a mail address is a sufficient	Reviewed comment, Will not incorporated any changes, this is the individuals personal opinion and ATF has responded by form letter stating

	<p>ATF Form 4473. I also find this requirement iterated in the Code of Federal Regulations at 27 CFR 178.11. It is noted the ATF Form 4473 declares pursuant to the federal Privacy Act, the “Solicitation of this information is authorized under 18 U.S.C. Section 1923(g) Researching 18 U.S.C. Section 1923(g), I am unable to locate anything specific that allows the ATF to impose requirement that a purchaser provide a residence address, only that a purchaser provide an address.</p> <p>(3) As the ATF Form 4473 is reviewed and redesigned, it needs to be brought into compliance with the letter of congressional authority, so that it does not exceed congressional grant of authority as the current ATF Form 4473 does. That form should simply reiterate the congressional grant of authority by requiring an address, which would include either a residence address or a mail address.</p>	<p>address for government purposes. Notwithstanding this, the ATF requires on its Form 4473 that a firearm purchaser must supply a “residence address” and that a mail address is insufficient for the purpose and does not satisfactorily complete the Form 4473 and purchasers are required to show a government-issued identification that includes a residence address (not a mailed address).</p> <p>Please be advised that personal privacy is an individual right Montana citizens have affirmatively reserved to themselves protected from government intrusion by a provision of the Montana Constitution, to wit: Article II, Section 10, Right of privacy. The right of individual privacy is essential to the well-being of free society and shall not be infringed without the showing of a compelling state interest.</p>	<p>that we have taken this comment into consideration.</p>
--	---	---	--

6/13/08 Kevin L. Dodson Manager of Loss Prevention Dick's Sporting Goods	(1) Question 1 can a description of what should be done for middle initial only be added.		Accepted , this is addressed on the form in block 1. Middle Name (if no middle name , state "NMN")
	(2) Question 2 Can the box for county be a little bigger?		Accepted. More space is added to the box.
	(3) Question 11a By including the instruction for repair guns some may get confused. On the back of the form it states anyone who answers No NICS should not be contacted.	I think it may cause some confusion. Can they just say "Yes" if they are picking it up?	Accepted , language was added to the instructions 11.a Please note: EXCEPTION: if you are picking up a repaired firearm(s) for another person, you are not required to answer 11.a. and may proceed to question 11.b.
	(4) 11a – 11l Can it instruct people to place an X	It will be easier to cross over into other boxes to get skipped because the spacing is to close.	Accepted , incorporated yes no box(es) on the form and added language to 11 instructions to

			state Answer 11.a. through 12 by checking or marking yes or no ect..
	(5) 11c Can it reference people pardoned or expunged to read the instructions prior to answering.		Accepted, incorporated language in 11.c. Exceptions.
	(6) Question 12 Please separate a little from question 11l		Accepted, This has incorporated with the reformatting of the form.
	(7) 21 Make a little bigger.		Accepted, Additional space has been added 21.
	(8) 21c Is it possible to reference completing 21d if delayed was checked.		Accepted, Incorporated in instructions for question 21,22,23, NICS Background Checks.
	(9) Question 26 Can this just say “and” instead of “and/or”		Denied, If the manufacturer and Importer are different, the FFL should include both.
	(10) 30a Why does it have to be written instead of numbers and is this question	This will get missed a lot by dealers.	Denied, ATF Counsel

	necessary?		recommends FFL handwrite this information for investigative purposes (hand writing analysis)
	(11) Questions 33,34,35 and 36 Can directions be added to indicate what needs completed for delayed and denied transactions.		Accepted , this is included in the instructions Transferor/Sellers Information.
	(12) Can a standard format be suggested for the dates mm/dd/yy or mm/dd/yyyy etc...		Accepted , this has been changed for 21a.
	(13) In question two it states two letter abbreviations are acceptable ST. and Rd. What about Ave. and Blvd etc.. I think stating two letters will cause confusion. Might be easier to just let State abbreviations be only acceptable.		Accepted , language has been incorporated in question 2, stating two letter abbreviations are acceptable.
6/30/08 Walter Meissner Auto Sport Distributors	(1) I feel the page layout would be much easier to store (for FFLs) than the present layout.	Provided an example of ATF Form folded layout.	Denied. This layout cannot be accepted at this time.
6/27/08 Jake McGuigan National Shooting Sports Foundation, Inc.	(1) We appreciate the efforts of ATF to make improvements which both streamline the process for our retailers and make it easier for the consumer.		Reviewed Comment. Will not incorporate any changes, this is the individuals

			personal opinion and ATF has responded by form letter stating that we have taken this comment into consideration.
	(2) The initial instructions on the Form 4473 have all been bolded including the directions to “PLEASE PRINT” which should keep customers from using handwriting. The order of the instructions are also more logical and has been renumbered to correspond to the question or block on the form. All of these are major improvement over previous versions of the form.		Reviewed Comment. Will not incorporated any changes, this is the individuals personal opinion and ATF has responded by form letter stating that we have taken this comment into consideration.
	(3) The instructions from Item 2 now state that the two-letter postal service abbreviation for the stat can be used. Item 2 has also been rearranged to provide more space for the country of residence, looking at the form though it seem that even more space could be created by slightly narrowing the zip code box.		Accepted. reworded language to U.S. Postal abbreviations are being accepted.
	(4) From a simple consistency standpoint Item 7 should have the directions write the date mm/dd/yyyy.	All other sections of the form are is in this format.	Accepted, change to 20a has been

			incorporated.
	(5) The biggest change to the entire form takes place with regards to questions 11 and 12 which will now have two columns on the right, side, one labeled yes, and on with not. The instructions have been amended to add directions that the buyer must check yes or no to each question.	This is a positive change and will lead to fewer retailers having mistakes on a Form 4473 that contains “Y” or “N” as answers.	Reviewed comment. Will not incorporated any changes, this is the individuals personal opinion and ATF has responded by form letter stating that we have taken this comment into consideration.
	(6) The yes or no columns are a major change that we feel should be made, but at the same time there are some negatives. It seems that the boxes in the current draft form might be a little small and too narrow.	A better solution to the yes or no checks boxes would be having both words written next to the question each in a column and the purchaser could circle either word. This will avoid possible stray marks in other boxes and be clear to the dealer and purchaser the intent of the answer.	Reviewed comment. Changes to the columns have been incorporated.
	(7) Items 12 and 13 of the form involving non-immigrant aliens have been clarified for the better.	This change is a positive to the 4473, but since this section only affects a small number of consumers the ATF might want to consider a form strictly for aliens (non-resent and resident). The ATF	Reviewed comment. Will not incorporated any changes, this is the individuals personal opinion and ATF has responded by

		developed a Spanish version of the 4473 which has been a tremendous help for dealers and having a separate page dedicated to resident and non resident aliens would also help to clarify the process.	form letter stating that we have taken this comment into consideration.
	(8) There is an expressed need from our members to have a section to include a customer's phone number somewhere in Section A.	There are many situations where an FFL needs to contact customers after a sale. A perfect example of this is for any corrections the dealer needs to make, a delayed background check, or even a product recall. Many retailers already write the phone number down in the margin, but formalizing the procedure by creating a section will take some of the hassle out of contacting a customer after they leave the store.	Accepted, A new block 30c has been added for any optional information.
	(9) There has been addition to Item 18 to include "other" firearms. This will allow our dealers who transfer receivers, for example, to have a place to enter it on the form.		Reviewed comment. Will not incorporate any changes, this is the individual's personal opinion and ATF has responded by form letter stating

			that we have taken this comment into consideration.
	(10) Item 21a is one of the most frequently missed by FFLs. This is the section where the FFL records the date that NICS or the State agency conducted the background check.	Moving the word date to the front should help retailers from overlooking it but simply making “date” boldfaced would also let it stand out more and not be easily missed.	Accepted , the date format has been changed for 21a.
	(10) Item 26 has now been clarified to note that both the manufacturer and the importer must be entered, if they are different. Very often this is missed but these changes should draw enough attention to hopefully eliminate the problem.		Reviewed comment. Will not incorporate any changes, this is the individuals personal opinion and ATF has responded by form letter stating that we have taken this comment into consideration.
	(11) Item 30a is a new section that requires the total number of firearms transferred to be entered. Having the number written will also help in eliminating missing inventory through either changing or adding stolen firearms to previously completed 4473.	While it is good this section of the form is not seen by the consumer so in actuality there is no oversight and nothing stopping the dealer or employee from filling in the form after the customer leaves. A simple solution could be to slightly change	Denied. ATF has determined that a written numeral will be required.

		the signature line so that the customer writes the number of firearms he is accepting or circles a number from 1-5. That would at least provide a better check.	
6/30/2008 Luke D. Thompson Big 5 Sporting Goods	<p>(1) Question 1 We suggest that the instruction to this question be modified to specify how a purchaser with a hyphenated last name should enter their name on the form.</p> <p>(2) Question 2 we suggest that the “two-letter” restriction for U.S. Postal abbreviations be removed, thereby allowing all U.S. Postal abbreviations for the Current Residence Address field.</p> <p>(3) Question 2 We suggest that the form or instructions be modified to specify that City and County information must be fully spelled out, with no abbreviations.</p> <p>(4) Question 20(c) We suggest that the form be modified to provide additional space or two (2) additional lines to allow for information relating to up to three (3) documents is the average number of documents provided to satisfy the 90-day residency period.</p>		<p>Denied, instructions are self explanatory, no need to add additional info regarding hyphenated names.</p> <p>Accepted, The U.S. Postal abbreviation has been removed.</p> <p>Denied, Question 2 spacing is sufficient for buyer to spell out with no abbreviations.</p> <p>Denied, additional documentation</p>

	<p>(5) Question 30(b) we suggest that instead of requiring a “Yes” or “No” answer from all dealers (including retailers who do not conduct Pawn Redemptions) on all forms as to whether the transaction is a Pawn Redemption, the question be changed to include only one box and to require that the box be checked only if the transaction is a Pawn Redemption, as follows: “Check this box if any part of this transaction is a Pawn Redemption.”</p> <p>(6) Question 33-35. We suggest that the instructions be expanded to specify that the seller is not required to complete Questions 33-35, if a transaction is cancelled by either the seller or purchaser, without any “Denied” or “Cancelled” response from NICS.</p>		<p>can be added to the form.</p> <p>Denied, Question 30b. must have a yes or no for dealers to determine whether to proceed with the transaction.</p> <p>Denied, instructions have been clarified to state for denial and cancelled NICS transaction the person who completed Section B must complete Section D, questions 33-35.</p>
--	--	--	---

6/27/08 Fran Bishop	Asked for draft copy of ATF F 4473.		Forwarded Draft version of ATF F 4473
6/24, 2008 Darrin E. Green Double Eagle Firearms, Inc.	Electronic version ATF 4473 benefits: <ol style="list-style-type: none"> 1. Enhance the utility and clarity of the information to be collected. 2. Minimize the burden of consumers and dealers in completing the form through the use of automated, electronic and technological collection techniques.e.g.,. 3. It would reduce mistakes—no more violations for a “Y” instead of a ‘Yest” and a prohibited person would not be able to complete the form. 4. Shorten ATF inspections—less time spent reviewing 4473’s. 		Reviewed comment. Will not incorporate any changes, this is the individuals personal opinion and ATF has responded by form letter stating that we have taken this comment into consideration.
J.M. Gun Repair, Inc.	Electronic ATF-4473, the electronic version will not work for most business. A lot of individuals are not able to use a computer and some business don’t have one. One would have to have a special		Reviewed comment. Will not incorporate any changes, this is the individuals

	<p>computer just for the E-4473 as you wouldn't want the customer using your computer. This would cost a store a lot of money. Then many store owners aren't able to use a computer. One wouldn't have easy access to the old 4473 to refer to information for the Tracing Center. This E 4473 would slow down business as only one person at a time could be filling it out where as with the paper forms multi people can fill them out at once. Further more, ATF doesn't allow a person to answer with just "Y" or "N". The word must be written out.</p> <p>What would happen if a business computer crashed? Now, how would you get the old "E" forms off of a crashed computer? The computer would is for ever changing so that the type of discs used today my not work in tomorrows computer. No how do you get the old "E" forms off? Count this business out for the E forms.</p>		<p>personal opinion and ATF has responded by form letter stating that we have taken this comment into consideration.</p>
<p>7/3/08 Jacquie Hair Vice President Cash America Managing Associate</p>	<p>1. Section entitled "The Person Transferring the Firearm(s) Must Complete Questions 33-36. For Denied/Cancelled Transactions, The Person Who Completed Section B</p>	<p>It is difficult to ensure a particular employee will be available to complete this Section on any given day. It may be that employee's</p>	

<p>General Counsel</p>	<p>Must Complete Questions 33-35.</p> <p>Cash America asks that the Notices, Instructions and Definitions Section make it clear the “Person” referred to in this section can mean any employee of the corporation/company/shop/establishment, etc.</p>	<p>day off, the employee may no longer be with the company, etc. Cash America asks from some flexibility to accommodate the customer and the completion of the transaction.</p>	
	<p>2. Cash America requests that a definition be added to the Notices, Instructions and Definitions Section that defines Transferor/Seller as the individual handling the transaction in which a transfer or sale is contemplated but that the title does not imply that an actual transfer or sale has taken place.</p>	<p>The requested definition is intended to make clear that the information in items 33-35 is being completed or contemplated but denied/cancelled transfer and not an actual transfer. Without the definition, it appears on the face of the document as if the firearm has been transferred.</p>	
	<p>3. Section A, Question 11.i. Definition of Misdemeanor Crime of Domestic Violence (found on page 4).</p> <p>Cash America requests that the last sentence be modified to clarify to the reader (buyer/customer) when he/she is permitted to answer the question with a “no” The current language is confusing in that it states: “A person who has been convicted of a misdemeanor crime of domestic violence is also not prohibited</p>		

	<p>unless “(emphasis added) The also implies that the proceeding information discussed not being prohibited. It does not, Additionally, the information listed the “unless” is confusing to the reader. We request a rewording be considered.</p>		
	<p>Form 4473 Color Cash America requests that the ATF consider creating this form in the Yellow previously used by the ATF. Local ATF field personnel have expressed to us a desire to have it return to the Yellow as well. The color paper helps differentiate the 4473 from other paperwork.</p>		<p>Accepted, the form will be returned to Yellow.</p>

