

**DEPARTMENT OF JUSTICE
BUREAU OF ALCOHOL, TOBACCO, FIREARMS AND EXPLOSIVES
Supporting Statement
OMB #1140-0005**

**Application and Permit for Importation of Firearms, Ammunition, and
Defense Articles, ATF F 6 (5330.3A) Part I, previously known as Application and Permit
for Importation of Firearms, Ammunition, and Implements of War, ATF F 6 (5330.3A)
Part I**

A. Justification

1. Importation of firearms, ammunition, and defense articles into the United States is subject to the provision of 18 U.S.C. 925(d) and (e), 22 U.S.C. 2778, and 26 U.S.C. 5844. Except as provided, or specifically authorized by the Attorney General, the importation of articles coming within the purview of these statutes is restricted or prohibited. In general, the importation of firearms is permitted only if the firearms meet certain criteria and the Attorney General authorizes the importation.

The form **ATF F 6 (5330.3A) Part I** has been amended as follows:

All references to “Implements of War” have been changed to “Defense Articles”. Implements of War was not defined in the regulations and Defense Articles is the legal description, defined in 27 CFR Part 447.

In Section I, the following changes were made:

-
- Block 8a in the header column, Add “City and State”
 - Block 8c in the header column, change “guage” to “Gauge”
 - Block 8g in the header column, add “(required)”
 - Block 8 row header column, change “Implements of War” to “Defense Articles”
 - Block 8 Ammunition Row – add a column with “(Core Material (Lead, Steel, etc))”

The additions to the manufacturer column were made so applicants would more clearly understand that at a minimum city and state or city and country are required information. The misspelling of gauge was corrected throughout the form. Model name is often left blank so “required” was added. Applicants often do not indicate on the form if the ammunition they seek to import is lead or steel core. This information is needed by ATF in order to determine if the ammunition is sporting or not. Delays often occurred when we had to ask for the additional information.

In Section II, the following changes were made:

- Block 17, Change “Implements of War” to “Defense Articles”
- Block 17, add a check box for “Conditionally Approved”. This status has always been used by ATF but was previously not included on the form

On the Firearms Continuation Page, the following changes were made:

- On Column G, add “(required)” for the Model
- On Column C, change “Guage” to “Gauge”, previously described above.
- Added in Block 8a in the header column, “City and Country”.

On the Implements of War Continuation Page,

Change “Implements of War” to “Defense Articles”. Add in Block 8a in the header column, “City and Country”.

On the Ammunition Continuation Page, the following changes were made:

Add column for “(Core Material (Lead, Steel, etc))”, Column b add “(Ball, Wadcutter, Shot, AP, Tracer (rounds))” and Column c change “Guage” to “Gauge”, previously described above. The addition of Ball, Wadcutter, etc., matches the front page of the Form 6; these descriptors had previously been left off the continuation page. Add in Block 8a in the header column, “City and Country”.

On the Instruction Pages, the following changes were made:

General Information

- Item 1, line 2, change “Implements of War” to “Defense Articles”
- Item 2, line 3, change “Implements of War” to “Defense Articles”
- Item #6, first sentence, add a comma after alien (“If you are a nonimmigrant alien,”)
- Item 8, line 7, change to “use and not for resale, the date of return, and that he is a nonresident U.S. citizen returning to the “
- Item 8, line 10, change to “U.S. citizen or nonimmigrant alien immigrating to the United States upon entry into the United States, since once he is in the United States, and”
- Item 8, delete the last two sentences

Release from Customs

- Item 20, line 1 add “For non-commercial imports,” to the first sentence
- Add Item #23, “For commercial imports, the CBP copy of the Form 6A will be transmitted to CBP electronically through the Automated Commercial Environment (ACE). For more information on how to use ACE, visit the Trade Resource Center at www.itds.gov or contact a CBP client representative at 1-571-468-5500.”
- Add Item #24, “Licensed importers and AECA registrants are still required to file their copy of the Form 6A with ATF within 15 days of release from CBP custody. This copy will have Sections I and III completed. Section II is not required.”
- Item #23 becomes Item #25
- Item #24 becomes Item #26

Prohibited Persons Under US Law

- Item 25, correct alignment. Second column, 5th line change to “alien illegally in the United States or is a non-immigrant alien admitted to the United States under a visa.”
- Move the verbiage in item 25 to item 23, move the verbiage in item 23 to item 24 and move the verbiage in item 24 to 25.

2. The data provided on ATF Form 6 (5330.3A) Part I, Application and Permit for Importation of Firearms, Ammunition, and Implements of War, is to allow ATF to determine if the article(s) described on the application qualifies for importation by the importer, and to serve as the authorization for the importer. The approved form also serves as the authorization to U.S. Customs and Border Protection (CBP) to allow the listed articles entry into the United States. Many importers use the form for internal accounting purposes.

Additionally, information may be disclosed to other Federal, State, foreign, and local law enforcement and regulatory agency personnel to verify information on the application and to aid in the performance of their duties with respect to the enforcement and regulation of firearms and/or ammunition where such disclosure is not prohibited by law. The licensee is required to retain this form permanently.

3. The form is available on the ATF website www.atf.gov and it is fillable. The form may be printed and mailed to ATF. The form may also be submitted to ATF electronically via the eForms system. The link may be found at www.atfonline.gov. It is estimated that 3,700 of the respondents complete this form electronically. The remaining respondents mail the form to ATF.

4. ATF uses a uniform subject classification system to identify duplication and to ensure that any similar information already available cannot be used or modified for use for the purpose of this information collection.
5. ATF does not use any method to minimize the burden to small business since all entities, regardless of size, are required by statute to complete this form.
6. The consequence of not conducting this information collection would result in persons illegally importing firearms, ammunition, and implements of war into the United States. This form serves as authorization to import such articles.
7. There are no special circumstances as this information collection is conducted in a manner consistent with 5 CFR 1320.6.
8. The ATF industry analyst who is very aware of the needs of the import community was involved during the creation of this form. No comments were received.
9. No decision of payment or gift is associated with this collection.
10. Federal firearms licensees keep this information in locked files in a secured location. Confidentiality is not assured.
11. No questions of a sensitive nature are asked.
12. The number of respondents associated with this collection is 10,000. Each respondent completes the form one time. The total number of responses is 10,000. The time necessary to complete the form is 30 minutes. The total annual burden is 6,500.
13. The respondents that do not file electronically must mail the form to ATF. Therefore, the cost to the respondents who choose not to file electronically is postage. Of the 10,000 respondents that complete the form, 3,700 file electronically. The postage cost is based on 6,300 respondents x \$.49 postage rate = \$3,087.00
14. Estimates of annual cost to the Federal government is the printing of forms that are stocked at the ATF Distribution Center for respondents who choose to mail the form:

Printing	\$6,000.00
----------	------------
15. The adjustments for the submission of this collection from 2014 are as follows: a 3,500 increase in the number of respondents, a 3,250 increase in the burden hours, and a \$1372 increase in the cost. The increases are due to the period of validity being extended from one year to two years.
16. The results of this collection will not be published.

17. ATF does not request approval to omit display of 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

This information request does not employ statistical methods.