

Supplemental Document: Justification for a no material/non-substantive change

ATF requests the following changes to ATF Form 4 (5320.4):

1. As a result of the establishment of the National Firearms Act (NFA) Division, references to the 'Branch' are changed to 'Division' in the following locations:
 - a. Mailing address on the face of the form (all copies)
 - b. Information for the Chief Law Enforcement Officer (after item 12)(all copies)
 - c. Important Information for Currently Registered Firearms (after item 20) in the first, second, third and sixth sections (all copies)
 - d. Instruction 2.m
 - e. Instruction 3
 - f. Instruction 4 (twice)
 - g. Instruction 5
 - h. Instruction 6
 - i. Instruction 8
2. Item 15 (photograph) – the photograph is not required on the CLEO copy, so item 15 should be grayed-out on the CLEO copy only
3. CLEO copy – gray-out the ATF use space at the bottom of the face of the form as there is no ATF approval of the CLEO copy which is sent as a notification.
4. Instruction 2.d, add language after paragraph title to clarify differences in what Federal firearms licensees are required to file
 - a. **Completion of Form** (NOTE: if the transferee is a Federal firearms licensee except for a Type 03 licensee, items 12, 13, 14, 15, 16, 17, 18 nor 19 are required to be completed).
5. Instruction 2.h(4) – to further clarify who can sign the application, insert 'or such other employee of the Federal firearms licensee as authorized by a responsible person' after 'a responsible person of the Federal firearms licensee'