

Department of Justice  
Bureau of Alcohol, Tobacco, Firearms and Explosives  
Information Collection Request  
Supporting Statement  
1140-0031

Records of Acquisition and Disposition, Registered Importers of Arms, Ammunition and Defense  
Articles on the U.S. Munitions Import List, ATF REC 7570/1

## A. JUSTIFICATION

### 1. Necessity of Information Collection

In furtherance of world peace and the security and foreign policy of the United States, the President is authorized to control the import and the export of defense articles and defense services, and to provide foreign policy guidance to Americans involved in the export and import of such articles and services. The President is also authorized to designate those items which shall be considered as defense articles and defense services, and to promulgate regulations for the import and export of such articles and services. The items so designated shall constitute the United States Munitions List (USMIL).

The records associated with this information collection are unique, in that they are of imported items that are on the U.S. Munitions Import List (other than firearms and ammunition). The listed items are not necessarily firearms or ammunition, but are items that must be accounted for as per the law, 22 U.S.C. 2778 and regulations 27 CFR 447.54. The importers must register with ATF and file an intent to import specific items, as well as certify to the ATF, that the imported items were in fact received. Registration is accomplished by completing ATF F 4587 (5330.4), Application to Register as an Importer of U.S. Munitions Import List Articles, which is approved under OMB control number 1140-0009. Applicants may request to register from one to five years, and pay the annual registration fee of \$250. An electronic version of this form is available on the ATF website. Regulations 27 CFR 447.54, specifically state that the records collected under this collection should include information that has any bearing on the importation of the defense articles on the United State Munitions Import List, such as those related to acquisition and disposition including ATF Forms 6 and 6A. This records system is separate and apart from what is normally considered to be a Federal firearms licensee's "bound book" of acquisition and dispositions. The records required of persons who import United States Munitions Import List Articles, are usually for commercial purposes, and are required to be kept for a period of 6 years. The regulation that specifically addresses this issue is 27 CFR 447.34.

The U.S. Munitions Import List includes the following:

Category I—firearms

Category II—artillery projectors

Category III—ammunition

Category IV—launch vehicles, guided missiles, ballistic missiles, rockets, torpedoes, bombs and mines

Category V of “Munitions List” deleted as inapplicable to imports

Category VI—vessels of war and special naval equipment

Category VII—tanks and military vehicles

Category VIII—aircraft, spacecraft, and associated equipment

Categories IX, X, XI, XII and XIII of “Munitions List deleted as inapplicable to imports

Category XIV—toxicological agents and equipment and radiological equipment

Category XV—Reserved

Category XVI—nuclear weapons design and test equipment

Categories XVII, XVIII, and XIX of “Munitions List” deleted as inapplicable to imports

Category XX—submersible vessels, oceanographic and associated equipment

Category XXI—miscellaneous articles

## 2. Needs and Uses

The records for this information collection, are established as per 27 CFR 447.34 (b), and are maintained at the registrant’s business premises, where they are available for inspection by ATF officers, during compliance inspections or criminal investigations. These records may also be used by the registrant for accounting purposes, and by the Bureau in testing for compliance with the Arms Export Control Act of 1976, as amended (22 USC 2778). These records can also be used by ATF personnel to verify that the importer has, when required, filed the appropriate ATF Forms 6 and 6A to import articles on the USMIL, and has also obtained the required retransfer authorizations. ATF personnel may also use these records, to determine importer compliance with the requirements of the Arms Export Control Act (AECA).

## 3. Use of Information Technology

This collection of information does not involve the use of automated, electronic, mechanical, or other technological collection techniques, since the affected records are not transmitted to any other source, but rather, maintained on the business premises. This is not a registration requirement but a record retention requirement. The AECA does not specify that the records must be maintained in paper form. However, some articles on the USMIL are also regulated under 27 CFP Part 478, which mandates the procedures for obtaining a variance from ATF,

in order to maintain electronic records. For defense articles covered solely by the AECA, electronic records may be maintained.

4. Efforts to Identify Duplication

ATF uses an agency subject classification system to identify duplication. No similar information is available from any other source.

5. Minimizing Burden on Small Businesses

ATF does not use any method to minimize the burden to small businesses, since all entities regardless of size, are required to keep these records.

6. Consequences of Not Conducting or Less Frequent Collection

Less frequent collection of this information would pose a threat to public safety.

7. Special Circumstances

This data will be collected in a manner consistent with the guidelines in 5 CFR 1320.6.

8. Public Comments and Consultations

No public comments were received during the 60-day or 30-day Federal Register notice periods for this IC.

9. Provision of Payments or Gifts to Respondents

No payment or gift is associated with this collection.

10. Assurance of Confidentiality

The records are maintained on the premises of the licensee in a secured location. These records are not available to the general public. Only ATF Industry Operations Investigators have access to these records. Confidentiality is not assured.

11. Justification for Sensitive Questions

No questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private are associated with this information collection. Record keepers are not required to maintain records of a sensitive nature.

12. Estimate of Respondent's Burden

There are 50 respondents associated with this collection. Each respondent will respond one time. The total annual responses are 50. Each respondent will spend 5 hours each to complete this record keeping requirement. The total annual burden associated with this information collection is 250 hours.

13. Estimate of Cost Burden

There is no cost burden to the respondent regarding this information collection.

14. Cost to Federal Government

There is no cost to the Federal Government.

15. Reason for Change in Burden

There are no program changes or adjustments associated with this collection.

16. Anticipated Publication Plan and Schedule

The results of this information collection will not be published.

17. Display of Expiration Date

ATF does not request approval to not display the expiration date for OMB approval of the information for this collection, as there is no form involved.

18. Exception to the Certification Statement

There are no exceptions identified in Item 19, "Certification for Paperwork Reduction Act Submission," of OMB Form 83-I.

**B. STATISTICAL METHODS:**

This collection does not employ statistical methods.