

Department of Justice
Alcohol, Tobacco, Firearms and Explosives
Supporting Statement
Information Collection Request 1140-0019
Federal Firearms License (FFL) RENEWAL Application
ATF Form 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 either firearms, or ammunition, without first obtaining a license to do so. These activities are licensed for a specific period. The benefit of a collector's license is also provided for in the statute. In order to continue to engage in the afore mentioned firearms activities without interruption, licensees must renew their Federal Firearms License (FFL) by filing Federal Firearms License (FFL) RENEWAL Application - ATF F 8 (5310.11) Part II, prior to its expiration.
2. The information collected on the Federal Firearms License (FFL) RENEWAL Application - ATF F 8 (5310.11) Part II, is used to identify the applicant and determine their eligibility to retain the license. The renewal form is filed by the licensee, so they can continue to engage in firearms activities. As long as 18 U.S.C. 923 requires that a person wishing to engage in the firearms business or the collection of curios and relics firearms pays a fee and file an application, this form or one like it will be necessary. Without the information provided by applicant on the renewal form, ATF might renew the FFL for a person who is prohibited by law from engaging in firearms business activity or collection.
3. The Federal Firearms License (FFL) Renewal Application - ATF F 8 (5310.11) Part II is issued by the ATF's Federal Firearms Licensing Center (FFLC) in Martinsburg, West Virginia. The form is unavailable on the ATF website, because it is electronically generated from ATF's FFL database, approximately 90 days prior to the expiration of an existing FFL license. The form is pre-populated with data related to the expiring license, including the appropriate renewal fee. The prepopulated data reduces the respondent burden and processing delays, while increasing the accuracy of form completion. Once generated, the partially pre-filled form is distributed to respondents for completion of the remaining applicable fields, signature, and submission of payment for processing. All completed forms must be accompanied by payment via check, money order, or credit/debit card for processing. Electronic or online payment options to renew a FFL is currently unavailable.

4. ATF uses a uniform subject classification system to identify duplication and to ensure that similar information that is already available, cannot be used or modified for use for the purpose of this information collection.
5. This collection of information has no significant impact on small businesses or other small entities.
6. Less frequent use of this information collection would pose a threat to public safety, since the collected information helps ATF to ensure that the applicant remains eligible for a FFL renewal.
7. This information collection is conducted in a manner consistent with 5 C.F.R. § 1320.6.
8. No comments were received during the 60-day Federal Register notice period. However, a 30-day notice will be published in the Federal Register to solicit public comments.
9. No payment or gift is associated with this collection.
10. In accordance with the System of Records Notice (SORN) Justice/ ATF-008 Regulatory Enforcement Record System FR Vol. 68 No. 16 3558, dated January 24, 2003, physical records for this IC are filed and stored in cabinets located in rooms that are locked during non-duty hours. Records are also stored in electronic form and are password protected. Direct access to these records is limited to specific Department of Justice personnel during the performance of official duties. Records may also be transmitted to routine users and others on a need-to-know basis and upon validation of the nature of their request. Disclosure of ATF Form 8 (5310.11) Part II is governed by 26 U.S.C. § 6103, as well as the Privacy Act of 1974, 5 U.S.C. 552a, and the Freedom of Information Act, 5 U.S.C. § 552. Any personally identifiable information (PII) collected in conjunction with this IC, will not be disclosed, except as provided by the Privacy and Freedom of Information Acts.
11. Questions of a sensitive nature are asked on the application in order to determine the continued eligibility of the applicant to renew a FFL.
12. Respondents desiring to update the responsible person (RP) information on an existing license must submit a letter in this regard, along with the completed FFL renewal application to ATF. The following information must be provided to add a RP to the FFL: Full Name, Position, Social Security Number, Home Address, Telephone Number, Date of Birth, Place of Birth, Country/Countries of Citizenship, Sex, Race and Ethnicity. Additionally, a properly prepared fingerprint card and photograph of the RP must be submitted with the completed FFL renewal application, as outlined in item 3 of the instructions.

13. There are approximately 34,000 respondents for this application collection. Each respondent responds once per license. The total annual responses to this IC is 34,000. The total time to complete the form is 30 minutes. Therefore, the total annual burden hours are 17,000.
14. The public cost burden for this IC is related to mailing of the FFL renewal form. This cost can be calculated as follows: 34,000 (# of respondents) x .55 (postage per respondent) is \$18,700.
15. The annual cost to Federal Government is estimated as follows:

Printing	12,240
Postal cost	17,000
Labor	<u>8,215</u>
	\$37,455

16. The adjustments associated with this information collection include a decrease in the total respondents and burden hours by 1,000 and 500 hours respectively, since the last renewal in 2018. Due to a slight increase in the postage costs from .49 cents to .55 cents currently, the total cost burden has increased by \$1,550, since the last renewal in 2018.
17. The results of this collection will not be published.
18. ATF does not request approval to not display the expiration date of OMB approval for this collection.
19. There are no exceptions to the certification statement.

B. Collections of Information Employing Statistical Methods.

This collection does not involve statistical methods.