

Department of Justice  
Bureau of Alcohol, Tobacco, Firearms and Explosives  
Information Collection Request  
Supporting Statement  
1140-0050  
Identification Markings Placed on Firearms

**A. Justification**

1. Necessity of Information Collection

Section 923(i) of the Gun Control Act of 1968 (GCA), as amended, (18 U.S.C. Chapter 44), requires licensed importers and licensed manufacturers to identify by means of a serial number, each imported or manufactured firearm. The serial number must be engraved, cast, or stamped on the receiver or frame of the weapon, in such manner as the Attorney General prescribes by regulation. With respect to certain firearms subject to the National Firearms Act (*e.g.*, machineguns), 26 U.S.C. § 5842 requires each manufacturer, importer, and anyone making a firearm, to identify each firearm by a serial number. The serial number may not be readily removed, obliterated, or altered. Section 5842 also requires the firearm to be identified by the name of the manufacturer, importer, or maker, and other such identification as the Attorney General may prescribe by regulation. Regulations that implement the above provisions of the law are set forth in 27 CFR § 478.92 for Title I firearms (*e.g.*, pistol, revolver, rifle shotgun) and 27 CFR § 479.102 for NFA firearms (*e.g.*, machineguns, silencers). In general, these sections require each licensed manufacturer, or licensed importer of firearms, to legibly identify each firearm by engraving, casting, stamping (impressing), or otherwise conspicuously placing on the frame or receiver, an individual serial number. The serial number must be placed in a manner not susceptible of being readily obliterated, altered or removed.

To reduce incorrect record entries by licensees and to make identification marking less susceptible to being readily obliterated, altered, or removed, ATF amended the regulations to prescribe minimum height and depth requirements for identification markings placed on firearms. Specifically, manufacturers and licensed importers must cast, stamp (impress), or engrave serial numbers to a depth of at least .003 inch and in a print size no smaller than 1/16 inch. All other required markings, including the special markings for semiautomatic assault weapons must be cast, stamped (impressed), or engraved to a depth of at least .003 inch. A minimum height requirement of 1/16 inch for all identification markings is not required, because such a requirement would be impractical. However, ATF believes these minimum standards will ensure that firearms are properly identified in accordance with the law. In addition, minimum standards will improve ATF's ability to trace firearms used in crimes.

2. Needs and Uses

The required firearms identification information supports Federal, State, and local law enforcement officials in crime fighting by facilitating the tracing of firearms used in

criminal activities. Specifically, the requirement for a serial number, along with other required markings such as caliber, model, name and manufacturer, and city and state of the manufacturer or importer, make any firearm uniquely identifiable and traceable. The systematic tracking of firearms, from the manufacturer or U.S. importer to the retail purchaser, also enables law enforcement personnel to identify suspects involved in criminal violations, determine if a firearm is stolen, and provide other relevant information to assist a criminal investigation.

### 3. Use of Information Technology

The use of information technology does not apply to this information collection, which requires manufacturers to physically mark all manufactured and imported firearms.

### 4. Efforts to Identify Duplication

There is no duplication of this information collection. The prescribed minimum height and depth requirements for the identification markings placed on firearms are unavailable elsewhere, although they are in accordance with the law.

### 5. Minimizing Burden on Small Businesses

This information collection has no significant impact on small businesses.

### 6. Consequences of Not Conducting or Less Frequent Collection

ATF's firearms tracing effort would be hindered without this information collection. The establishment of specific standards for marking and identifying firearms also ensure that licensees maintain accurate records containing firearms identification information, and that firearms serial numbers are not easily obliterated, altered, or removed.

### 7. Special Circumstances

There are no special circumstances associated with this information collection requirement, which is conducted in a manner consistent with 5 CFR § 1320.6.

### 8. Public Comments and Consultations

No comments were received during the 60-day Federal Register (FR) notice period. However, a 30-day FR notice will be published to solicit public comments.

### 9. Provision of Payments or Gifts to Respondents

No payments or gifts are provided to respondents.

### 10. Assurance of Confidentiality

Confidentiality is not assured. This information collection requires licensed firearms manufacturers and importers to place markings on firearms for identification purposes.

11. Justification for Sensitive Questions

No questions of a sensitive nature are associated with this information collection.

12. Estimate of Respondent's Burden

Currently there are 16,229 licensed firearms manufacturers and 1,701 licensed firearms importers. As such, the total number of respondents for this collection is 17,930. The total number of firearms that were recently imported into the United States is 3,986,663. Since all imported and manufactured firearms must be marked (stamped), the total number of responses is 3,986,663. The time it takes to mark the firearm is 5 seconds, as well as an additional 55 seconds to transport firearm to machinery, load machinery, and unload machinery. Therefore, the total time taken to transport, load, mark, then unload the machinery is 1 minute. The total burden hours for this information collection are 66,445.6 or 66,446 hours, which is equal to 17,930 (total respondents) \* 222.3495 (total responses per respondent \* 0.0166667 (1 minute or time taken for each response).

13. Estimate of Cost Burden

Firearm manufacturers must mark firearms in accordance with the Gun Control Act of 1968. These licensed firearms manufacturers and importers are required by regulation to mark a firearm with a unique serial number, make, model, caliber/gauge, city and State of manufacturer. The average direct and overhead cost to mark each firearm is approximately .92 cents. Therefore, the total cost burden associated with this collection is \$3,667,730, which is equal to 3,986,663 (total responses) \* .92 cents (total cost per response).

14. Cost to the Federal Government

There is no Federal Government cost associated with this information collection.

15. Reason for Change in Burden

Although there is an increase in the total respondents from 13,868 in 2018, to 17,930 in 2021, there is a reduction of both the total responses and burden hours from 5,137,771 to 3,986,663 and 85,630 to 66,446 hours respectively, due to fewer imported firearms. Consequently, the total cost burden for this collection was also reduced from \$4,726,749 in 2018 to \$3,667,730 in 2021.

16. Anticipated Publication Plan and Schedule

ATF does not plan to publish this information collection.

17. Display of Expiration Date

ATF will not display the Office of Management and Budget expiration date, since there is not form associated with this information collection.

18. Exception to the Certification Statement

There are no exceptions to the certification statement.

**B. Statistical Methods**

1. This information collection does not employ statistical methods.