

Department of Justice  
Bureau of Alcohol, Tobacco, Firearms and Explosives  
Supporting Statement  
OMB 1140-0009

Application to Register as an Importer of U.S. Munitions Import List (USMIL) Articles – ATF Form 4587(5330.4)

**A. Justification**

1. The Arms Export Control Act of 1976 (22 U.S.C. § 2778(1)(A)(i)) established a comprehensive system for regulating the importation of defense articles and services by implementing eligibility and permit requirements. Under 22 U.S.C. § 2778(1)(A)(i) and the implementing regulations in 27 CFR Part 447, all persons engaged in the business of importing defense articles and services, are required to register with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF). Specifically, they must register using the Application to Register as an Importer of U.S. Munitions Import List (USMIL) Articles – ATF Form 4587(5330.4) (ATF F 4587(5330.4)) and pay a registration fee.

On December 6, 1984, the Department of State published a final rule (49 FR 47684) revising the International Traffic in Arms Regulations (ITAR). ATF subsequently published a final rule (50 FR 42157 (1985)), to conform 27 CFR Part 447 to the revised ITAR. This final rule became effective on October 11, 1985. However, the procedures to register as an importer of defense articles and services have not changed.

ATF requests approval to make the following changes to ATF Form 4587(5330.4):

- The Registration number in the *For ATF Use Only* Section was aligned left.
- The statement above *Block 1* was updated to remove an extra space between the words “as” and “required.”
- *Block 5* was amended to remove an extra space after “for,” delete “Enclose check or money order for payment of fee indicated,” and change of instruction number from “3” to “2.”
- *Block 10* was updated to remove a duplicated “Jones” and correct the punctuation for “Mrs.”
- *Item 2* on the instruction page was updated to include the following statement: “This form must be completed via Pay.gov. Type “ATF Form 4587” in the search bar and the link to the application will appear.”

- The second sentence in *Item 3* on the instruction page was removed.
2. ATF personnel will use the data collected on ATF Form 4587(5330.4) to determine if the applicant is qualified to register as an importer, effect the registration, and facilitate the collection of registration fees. 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 a copy of their completed form permanently.
  3. The fillable ATF Form 4587(5330.4) is available on the Pay.gov website: [www.pay.gov](http://www.pay.gov). The form may be printed, completed, and mailed to ATF for processing. The form may also be submitted to ATF electronically via the eForms system.
  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 collection.
  5. ATF does not use any method to minimize the burden to small business. All business owners are required by statute to complete this form to register as an importer of defense articles and services, regardless of size of their business.
  6. People will illegally import firearms, ammunition, and defense articles and services into the United States without this collection. ATF Form 4587(5330.4) serves as authorization to be an importer of such defense articles and services.
  7. There are no special circumstances associated with this collection, which is conducted in a manner consistent with 22 U.S.C. § 2778(1)(A)(i).
  8. All comments received during the 60-day Federal Register (FR) notice period received a response. However, a 30-day FR notice will be published to solicit public comments.
  9. No payment or gift is associated with this collection.
  10. The confidentiality of information obtained from regulated individuals is protected under the provisions of 5 U.S.C. §552 and 26 U.S.C. §6103.
  11. No questions of a sensitive nature are asked.
  12. The number of respondents associated with this collection is 400. Each respondent completes the form once annually. The total responses are also 400.

Each respondents take approximately 30 minutes to complete the form. The total annual burden hours are 200. The record keeping requirement for this IC is 10 years.

13. Respondents who do not file ATF Form 4587(5330.4) electronically must mail the completed form to ATF for processing. Therefore, the cost to respondents who choose not to file electronically is postage. Of the 400 respondents who complete the form, 200 of them file electronically. The postage cost is based on 200 respondents x \$.55 postage rate = \$110.00.

14. The total Federal government costs for printing and stocking ATF Form 4587(5330.4) at the ATF Distribution Center are outlined below:

Printing	\$200.00
Labor	<u>\$11,600.00</u>
Total	<u>\$11,800.00</u>

15. Due to more individuals registering to import defense articles and services, the total respondents, responses, and burden hours to this collection have increased from 300, 300, and 150 hours respectively in 2018, to 400, 400, and 200 hours currently.

16. The results of this collection will not be published.

17. ATF is not requesting approval to exclude the Office of Management and Budget expiration date 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.