

1140-0015 Public comment summaries and ATF responses (2025)

[Application to Transfer and Register NFA Firearm (Tax-Exempt), ATF Form 5320.5 (“Form 5”)]

ATF received one set of comments on this information collection. The commenter, a dealer in NFA firearms, submitted a joint comment on ICRs 1140-0011, 1140-0014, 1140-0015, and 1140-0107, expressing support for the changes ATF is making to ATF Forms 5320.5 (“Form 5”), 5320.1, 5320.4, and 5320.23.

Comment summary

Specifically, the commenter stated that removing the requirement to send a copy of the form to CLEOs was a welcome change, and would alleviate concerns the commenter said CLEOs have about inadvertently creating a firearms registry in their office due to these forms. The commenter also advocated that all attempts to modernize the form, including allowing digital signatures, should be pursued and are also long overdue. Prohibiting digital signatures, the commenter added, imposes an unnecessary burden on applicants. The commenter also expressed support for the changes allowing a copy of photo IDs instead of requiring a 2” x 2” photograph and removing the requirement to submit fingerprints with each application, stating that neither requirement is needed even though required by statute.

ATF response

ATF appreciates the feedback from this commenter on the proposed changes. It is helpful to receive feedback, positive or negative, from persons impacted by our processes so we can make them more user-friendly and efficient. In response to the commenter’s suggestion that ATF should make all efforts to modernize these NFA forms, we think the following information will be helpful. The proposed changes to these forms reflect larger changes the agency is making to its NFA regulations and across other NFA forms, as well. These changes have been developing for some time and are projected to take effect during the next year. In addition to allowing electronic signatures, ATF is also making its NFA forms electronically fillable as the ICRs come up for renewal, and expects to move to solely electronic forms in 2026. In addition, NFA is continuing to build the rest of its forms into its eForms platform, so applicants can complete and submit the forms online.