

National Tracing Center (NTC) Trace Request/
Solicitud de Rastreo del Centro Nacional de Rastreo (NTC)
OMB control number: 1140-0043
OMB expiration date: 11/30/2025

Department of Justice
Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF)
Information Collection Request (ICR)
OMB 1140-0043
**National Tracing Center (NTC) Trace Request/
Solicitud de Rastreo del Centro Nacional de Rastreo (NTC)**
(ATF Form 3312.1/3312.1(S))

SUPPORTING STATEMENT

A. JUSTIFICATION

1. Explain the circumstances that make the information collection necessary.

ATF is responsible for providing firearms tracing services to law enforcement agencies that request such services as part of a criminal investigation. The Gun Control Act of 1968 (GCA) requires federal firearms licensees (FFLs) to create and maintain firearms acquisition and disposition (A&D) records, which ATF may inspect under specific circumstances. In relevant part, the GCA authorizes ATF to inspect these records when necessary to determine the disposition of one or more particular firearms in the course of a bona fide criminal investigation, and further authorizes ATF to provide information contained in such FFL records to law enforcement agencies for the same purpose. *See* 18 U.S.C. § 923(g)(1)(B)(iii), § 923(g)(1)(D), and its implementing regulations at 27 CFR 478.25. To carry out its firearms tracing responsibilities, ATF maintains a firearms tracing operation at the National Tracing Center (NTC).

Firearms tracing begins when ATF or another law enforcement agency recovers a firearm during an investigation and seeks to learn where it came from, submitting a tracing request to the NTC. Because of the statutory provisions described above, NTC can request information from FFL records. Crime gun tracing is the systematic process of tracking the movement of a firearm from its point of origin in U.S. commerce by either a manufacturer or importer, through the distribution chain (wholesalers and retailers), to identify the last known purchaser. Firearm tracing provides critical information to assist domestic and international law enforcement agencies with investigating and solving firearm-related crimes, detecting firearms trafficking, and tracking intrastate, interstate, and international crime gun movement.

2. Indicate how, by whom, and for what purpose the information will be used.

A law enforcement agency in the course of a criminal investigation submits a trace request on a firearm used or suspected to have been used in a crime to ATF in one of two ways: 1) electronically, through ATF's web-based firearms trace submission system, eTrace; or 2) manually, completing a Trace Request/Solicitud de Rastreo del Centro Nacional de Rastreo form (ATF Form 3312.1/3312.1(S)) in paper or electronically fillable format, and mailing, emailing,

or faxing the completed form to the NTC. NTC processes trace requests from federal, state, local, and foreign law enforcement officials, and manages all aspects of the tracing process.

Whether submitted via eTrace or by the Form 3312.1, the collection mechanism asks law enforcement to provide critical identification information about the recovered firearm as part of initiating the trace request. The required entries include a complete and accurate description of the firearm, such as make, model, caliber, and serial number; trace requestor name, agency name, address, phone number, badge number, and ORI number; information about the possessor and associates (if applicable), such as name, height, weight, sex, date of birth, ethnicity, and address; and firearm recovery information, such as date, address, and location. Law enforcement agencies may also submit requests regarding firearms with obliterated serial numbers or suspect guns.

Law enforcement agencies decide whether to request a trace based on their investigative needs, available resources, state mandates, and the context in which the firearm was recovered. Such requests are voluntary, at the discretion of the law enforcement agency, or submitted pursuant to state requirements.

Upon receiving a trace request, NTC uploads or manually enters the information into the Firearm Tracing System (FTS) and conducts a validation check to ensure they are processing trace requests accurately and consistently, resolve firearms misidentification before taking further action, and determine if the firearm's identification information is a match for another firearm in the FTS, such as a reported theft or other crime gun match. These steps can speed up the trace process. If there are no matches, NTC then relies on information that FFLs provide from a search of their own A&D records. NTC contacts each FFL to follow the firearm through its original chain of custody from the manufacturer/importer to a wholesale dealer, to one or more retail dealers, and finally to a purchaser.

Once the NTC completes a firearm trace, the trace results are provided directly to the law enforcement agency that submitted the request. The delivery process is secure, quick, and tailored to support active criminal investigations. For agencies with access, trace results are delivered through eTrace.

These tracing requests allow ATF and law enforcement personnel to generate investigative leads to link suspects to firearms used in criminal activities. Tracing information also helps to identify illegal firearms traffickers and trafficking activity. Trace information is frequently used by law enforcement agencies to identify suspects, gather intelligence on criminal activities, determine trafficking patterns, and connect firearms to criminal networks.

This information collection is a foundational component of the firearms tracing process, enabling ATF to fulfill its mission to support law enforcement, prevent firearms trafficking, and enhance public safety.

3. Describe whether, and to what extent, the information collection involves using automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection.

Approximately 96% of the tracing requests are submitted electronically. Some of these requests are emailed to ATF on the fillable electronic version of ATF Form 3312.1/3312.1(S). However,

the majority of tracing requests are submitted via the eTrace web-based system, which enables requesters to complete and submit an electronic version of the Form 3312.1/3312.1(S) online. Currently, more than 10,300 law enforcement agencies are connected to ATF's eTrace system, which allows law enforcement personnel to both submit trace requests and retrieve trace results. In addition, ATF has an application programming interface (API) that law enforcement agencies may use to connect their own records/case management systems to ATF's eTrace system. This allows them to submit trace requests and receive results directly within their own system, without having to go to the eTrace site to submit or check on whether a response has been provided.

4. Describe efforts to identify duplication.

This information is not duplicative and requires respondents to provide information from their acquisition and disposition records on a case-by-case basis. As a result, it is not available from any other source.

5. If the information collection impacts small businesses or other small entities, describe any methods used to minimize burden.

This information collection does not have a significant impact on small entities. Small entities affected by this collection may submit information electronically via email or through a portal.

6. Describe the consequence to federal programs or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

This collection is a tool for federal, state, local, tribal, and international law enforcement officials to (1) request that ATF trace a gun used in a crime, or (2) provide information to ATF regarding firearms with obliterated serial numbers or suspect guns. Without this IC, law enforcement officials would be unable to leverage investigative leads regarding illegal firearms trafficking activities or pinpoint purchasers of firearms used in crimes.

7. Explain any special circumstances that would cause the information collection to be conducted in a manner inconsistent with 5 CFR 1320.6.

While respondents are not required to respond (submit a trace request) more than quarterly as a set frequency, they may need to submit more than one trace request in a given quarter, depending upon how often such a need arises in the course of their law enforcement activities. This means respondents may respond anywhere from once a day, week, or month all the way to once a year, every few years, or never, depending on whether a firearm involved in a crime under their jurisdiction generates a trace request.

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

8. If applicable, provide a copy, and identify the date and page number, of the agency's notice published in the *Federal Register*, as required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB.

The 60-Day Notice was published in the *Federal Register* on 08/05/2025 (90 FR 37565). The comment period ended on 10/06/2025. ATF received two sets of comments. Please see the appendix at the end of this document for a summary of the comments and ATF’s responses.

9. Explain any decision to provide any payments or gifts to respondents, other than remuneration of contractors or grantees.

No payment or gift is associated with this collection.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

ATF has not assured respondents of confidentiality. However, the information being collected from law enforcement includes PII and is thus protected by the Privacy Act. The information is maintained by ATF in a system of records, Justice/ATF-003, Criminal Investigation Report System. The form that accompanies this ICR includes a Privacy Act statement the covers this information and informs respondents of the system of records, routine uses, etc. In addition, the Gun Control Act, at 18 U.S.C. 923(g)(1)(D), and its implementing regulation at 27 CFR 478.25, limit ATF’s disclosure of information collected under this ICR to requesting LEAs as part of a criminal investigation trace request.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

This information collection does not ask questions or require information of a sensitive nature.

12. Provide estimates of the information collection’s hour burden.

Respondents to this ICR are law enforcement agencies (LEAs) that may choose to submit trace requests, and that would then expend time completing the form and submitting it.

Currently, there are approximately 17,000 LEAs that may submit a trace request via eTrace. The actual total number of trace requests per year is 510,000 (based on the total number of trace requests submitted to ATF’s National Tracing Center (NTC) Division, resulting in an average of 30 requests per LEA.¹ ATF estimates that it takes six minutes (0.10 hours) to complete and submit a trace request form, making the LEA annual hourly burden 51,000 hours.² According to the U.S. Bureau of Labor Statistics (“BLS”), the wage for employee compensation for civilian workers averaged \$47.92 per hour worked in March 2025.³ Wages and salaries averaged \$32.92, while benefit costs averaged \$15.00 to account for fringe benefits such as insurance.

Table 1. Estimated annualized respondent cost and hour burden

Activity	Number of respondents	Frequency	Total annual responses	Time per response	Total annual burden (hours)	Hourly rate	Monetized value of respondent time
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¹ 30 responses per law enforcement agency = 510,000 trace requests / 17,000 local law enforcement agencies.

² 51,000 total hours = 510,000 trace requests * 0.10 hours per request.

³ https://www.bls.gov/news.release/archives/ecec_06132025.pdf

LEA trace requests	17,000	30	510,000	0.10	51,000	\$47.92	\$2,443,920
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The total monetized value of the time burden associated with this collection is \$2,443,920 (51,000 total hours * \$47.92 per hour).

13. Provide an estimate of the total annual cost burden to respondents or record-keepers resulting from the information collection. (Do not include the cost of any hour burden shown in Items 12 and 14).

There are no additional costs associated with this information collection.

14. Provide estimates of the annualized cost to the federal government.

ATF estimates no additional costs to the federal government associated with this collection. This is due to the current staffing and administrative capacity already in place to complete any marginal processing required under this information collection, with long-term staffing capacity serving as a sunk cost.

15. Explain the reasons for any program changes or adjustments.

The adjustments associated with this collection include an increase in respondents from 1,153 annually to 17,000 since the last renewal period, a difference of 15,847 per year. This is due to more law enforcement agencies submitting more trace requests each year. The adjustments therefore also include an increase in the total number of trace requests from 24,490 during the last renewal to 510,000 now. Consequently, the total burden hours have also increased from 2,449 to 51,000, resulting in a difference since the last renewal of 48,551 total annual hours.

16. For information collections whose results will be published, outline plans for tabulations and publication.

ATF will not publish the results of this collection.

17. If seeking approval to not display the expiration date for the information collection, explain the reasons that display would be inappropriate.

Current versions of these forms routinely continue unchanged through several OMB renewal cycles. Therefore, ATF requests approval to not display the expiration date on the form. We will still display the OMB control number.

18. Explain each exception to the certification statement.

This information collection does not include any exceptions to the certification statement.

B. INFORMATION COLLECTIONS EMPLOYING STATISTICAL METHODS.

This collection does not employ statistical methods.

Appendix

1140-0043 Public comment summaries and ATF responses (2025)

ATF received two sets of comments during the 60-day public comment period for this ICR. Both sets of comments were from industry trade organizations, one of which represents retailers in the farm store industry, which includes federally licensed firearms dealers, and the other of which represents the firearms industry and recreational shooting and hunting. ATF acknowledges and appreciates the comments and collaborative suggestions submitted by both organizations.

First commenter

One set of comments expressed support for ATF's mission to enhance public safety through efficient firearms tracing. While they applauded ATF's efforts to keep pace with the increased numbers of firearms trace requests over the past ten years (as reflected in the 60-day notice), they also noted that the continuing increase in trace requests over time and in the future presents an increasing burden for dealers, and strains staffing resources and elevates costs. To this end, the organization outlined two suggestions oriented toward streamlining and making more efficient the process for dealer responses to trace requests.

First recommendation

The commenter suggested that ATF should request each licensee to identify a primary point of contact responsible for receiving and coordinating responses to all trace requests. Entities holding multiple licenses could designate a centralized compliance office as the POC, provided they can coordinate timely access to required acquisition and disposition records for each licensee. ATF would then direct trace requests to this designated POC, and licensees could notify NTC in writing if they need to change the POC. The commenting organization's experience has been that trace requests often go to different locations, and a primary POC would strengthen compliance, improve response times, and reduce the chance of dealers missing requests.

ATF response

ATF agrees with the commenter that the number of trace requests has steadily increased over time and is expected to continue rising. As the data in the 60-day notice cited by the commenter illustrated, over the past ten fiscal years, the number of incoming trace requests has grown by nearly 70%.

The NTC Division provides an internal dealer profile module that permits multiple licensees associated with the same business entity to link with each other and to designate a centralized tracing POC, where applicable. Licensees can also use the dealer profile to document primary and alternate POCs and their contact information (name, preferred contact method, email, fax, phone, contact hours, after-hours contact, etc.).

Second recommendation

The commenter also recommended that ATF should require law enforcement agencies (LEAs) to explicitly classify their trace requests as "urgent" (e.g., assaults, kidnappings, homicides, etc.) or "routine," based on ATF's existing categories, convey the category to the dealer with the request, and base the dealer's required response time on the request's urgency. So, for example, instead of being required to respond within 24 hours to all trace requests, dealers would respond within 24 hours to urgent requests. But, the commenter said that, because ATF has a five-day window for responding to LEAs on routine requests, ATF should allow dealers up to five business days in which to respond to ATF on such requests. This would retain rapid investigative support for

urgent traces while allowing dealers to plan their resources and responses more effectively for the bulk of routine requests, the commenter added. The commenter also suggested that ATF consider simplified communication for routine trace requests, such as standardized electronic notices or batching, so dealers could respond in a single consolidated effort, which would also help reduce burden, as would encouraging dealers to use NTC Connect or an eTrace Direct API for faster responses.

ATF responses

ATF agrees that classifying requests as routine or urgent is helpful, and requires submitting LEAs to classify incoming trace requests as either routine or urgent. We also provide guidance so submitters know which requests fall into each group.

NTC strives to complete urgent trace requests within 24 hours and routine trace requests within seven days. In response to the commenter's suggestion that ATF allow a longer response time for routine trace requests, we can't consider changing response times in the context of this information collection because the response time is set by statute. 18 U.S.C. § 923(g)(7) states that "Each licensee shall respond immediately to, and in no event later than 24 hours after the receipt of, a request by the Attorney General for information contained in the records" ATF does not have authority to supercede statutory requirements. Aside from the statutory considerations, we note that, on average, each successful trace to an individual purchaser involves 3.5 licensees in the chain of distribution. Allowing each of them up to five days to respond instead of the current 24 hours would have a significant impact on overall completion time, potentially taking up to five times longer than NTC's current average trace processing time of 9.3 days. Given the importance of these traces to law enforcement in apprehending criminals who use firearms in crimes, and the impact that has on public safety, ATF would have reservations about lengthening the licensee response time even in routine cases because of this cumulative effect.

In response to the recommendation to simplify communication methods for routine trace requests, ATF agrees these kinds of changes help reduce burden on responding licensees. NTC continuously strives to make it as easy as possible for licensees to respond to trace requests by improving efficiency and work processes, and has incorporated practices such as standardized electronic notices, batching, and permitting dealers to respond to multiple requests in one response. NTC consolidates trace requests to the same licensee whenever possible to reduce unnecessary contacts. Additionally, NTC is implementing a new dealer contact service component within the Firearms Tracing System, which will provide standardized electronic notifications to licensees, along with fillable templates they can use to respond to a trace request.

ATF encourages manufacturers, importers, and wholesalers to voluntarily participate in the NTC Connect program, and is actively working to implement a more robust solution, known as FFL DIRECT. FFL DIRECT is a secure, asynchronous API service that will enable participating licensees to receive and respond to fully automated firearm trace requests. This service provides licensees the autonomy to conduct automated serial number searches against their electronic records in response to a trace request and electronically transmit disposition information to NTC without relying on inefficient manual methods such as email, phone, or fax. NTC encourages licensees to utilize NTC Connect and has already started promoting the new FFL DIRECT service. Services such as NTC Connect and FFL DIRECT are designed to reduce the burden on licensees and make the trace response process more efficient and secure. By using these tools, licensees can respond to trace requests more quickly and accurately, reducing the burden on the

licensee, while also increasing public safety through more timely crime-gun tracing.

Second commenter and recommendation

The second organization's comments were oriented toward protecting information obtained during trace requests. The commenter suggested that ATF include a clear reminder and explicit statement on ATF Form 3312.1 and its electronic equivalents that ATF may only provide a response for a bona fide criminal investigation by federal, state, local, or tribal law enforcement agencies or prosecutors, and that trace data obtained from such requests may not be knowingly and publicly disclosed pursuant to the restrictions in 18 USC sections 923 and 926 and the Tiahrt Amendment. The organization further requested assurance that NTC properly safeguards firearms trace and Firearms Tracing System (FTS) data once provided.

ATF response

ATF agrees with the commenter that it is important to notify respondents of the disclosure restrictions and to protect the information provided. Supporting law enforcement agencies in carrying out their public safety missions while ensuring the integrity, security, and responsible use of trace data remains a top priority, as protecting public safety and supporting our law enforcement partners are central to ATF's mission. To this end, ATF has planned enhancements already in progress that align with the commenting organization's input. Specifically, the modernized version of eTrace launched in September 2025, and is now available to LEAs. The updated system incorporates a mandatory acknowledgement banner that reinforces these statutory restrictions and requirements, ensuring that users are reminded of the appropriate use and protection of trace data before accessing the system. Additionally, under this new rollout, users are now required to again acknowledge these restrictions each time they retrieve trace results, confirming that such information is restricted to law enforcement use only.

In addition, ATF is adding a statement directly to Form 3312.1, as suggested by the commenter (and a Spanish version of the same statement on the Spanish form, Form 3312.1S). The banner is being added to the forms as part of this ICR renewal and is on the forms being reviewed by OMB.