

Department of Justice
Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF)
Information Collection Request (ICR)
OMB 1140-0010

Application to Transport Interstate or to Temporarily Export Certain NFA Firearms
(ATF Form 5320.20)

SUPPORTING STATEMENT

A. JUSTIFICATION

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

Certain National Firearms Act (NFA) firearms may not be transported interstate or temporarily exported by any person other than a qualified licensee, without approval from ATF, 18 U.S.C. 922(a)(4), and 27 CFR 478.28. The statute and implementing regulations require that a person wishing to transport certain NFA firearms outside the state in which they are registered must submit a written request for permission to ATF prior to transporting outside the state or temporarily exporting them outside the country. ATF developed the Application to Transport Interstate or to Temporarily Export Certain NFA Firearms, ATF Form 5320.20 (“Form 20”), to make it easier for persons to provide the necessary information and meet the requirement to submit a written request.

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

Persons who possess a registered machine gun, destructive device, short-barreled rifle, or short-barreled shotgun, and who want to transport the firearm interstate (either long-term (over 365 days) or permanently) or export it temporarily outside the country, must request ATF approval using Form 20. Once ATF authorizes the request, it returns a copy to the requestor, confirming approval to transport or export a firearm.

ATF reviews the information submitted on Form 20, ensures legality of the proposed transportation, and verifies that the firearm is registered in the National Firearms Registration and Transfer Record. ATF also uses the collected information to determine whether firearms are being lawfully transported, and to pursue criminal investigations on unregistered NFA firearms.

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.

Form 20 is available and electronically downloadable from the ATF website. It is fillable and can be submitted by email. Form 20 is currently being added to ATF’s online forms platform, eForms, and will be available as an eForm by the renewal date for this ICR. As a result, ATF expects all Form 20s to be submitted electronically during the next three years, following the same pattern as

previous forms made electronically fillable and added to eForms. Although persons used to have to fill the form out in duplicate, both the fillable form and the eForm automatically fill out the second copy, thereby eliminating the burden of completing the form twice, in addition to eliminating mailing time and costs.

4. Describe efforts to identify duplication.

This information is not duplicative and requires a person to submit information relevant to the lawfulness of their request to transport a firearm on a case-by-case basis. As a result, each applicant must provide unique information for each application, and it is not possible to use that information for other purposes or at later dates. 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 in this information collection before establishing the collection.

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.

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

Without this information collection, firearms could be transported illegally or to places where it would violate the law and present a public safety risk. Because a person's status can change over time, the frequency cannot be reduced – they must submit the information each time they want to transport an NFA firearm for long-term or permanent purposes, or outside the country. The statute also requires that they must request approval to transport NFA firearms.

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

Requiring respondents to report information to the agency more often than quarterly: Although ATF does not require respondents to report information at any established frequency under this ICR, the frequency is determined by how often any given person wants to transport an NFA firearm across state lines for long-term or permanent relocation, or temporarily outside the country. It is possible therefore that submitting an application to ATF might occur more than quarterly if a person applies more than once and during different quarters of the year.

There are no other special circumstances associated with this information collection, which is otherwise 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 November 28, 2025, 90 FR 54761. The comment period ended on December 28, 2025. The 30-day notice was published in the *Federal Register* on .

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

ATF does not provide payments or gifts in connection with this collection.

10. Explain 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 includes PII and is thus protected by the Privacy Act. The information is maintained by ATF in a system of records, Justice/ATF-008, Regulatory Enforcement Record System. The form that accompanies this ICR includes a Privacy Act statement that covers this information and informs respondents of the system of records, routine uses, etc.

The information on this form is also considered “tax information” or “tax return information” and any release is severely restricted under the Tax Reform Act (26 U.S.C. § 6103) and may be disclosed only to federal authorities for purposes of prosecuting violations of the NFA. It is protected as Controlled Unclassified Information (CUI).

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.

Over the three-year period since the last renewal, an average of 12,878 forms were filed annually to transport certain NFA firearms interstate for long-term temporary and permanent purposes and for temporary export. Since each filing is unique, the number of respondents is equivalent to the number of forms filed. The number of respondents under this collection is therefore also 12,878.

ATF estimates the time to complete the form is ten minutes (0.167 hours) because the forms are now electronic, no longer require the person to fill out a second copy, and are electronically fillable and submittable (during previous renewal, additional ten minutes was added for addressing and mailing). Therefore, the total number of burden hours associated with this IC is 2,151 hours (rounded) (12,878 respondents * 0.167 hours).

Because respondents must complete the process as a private individual and not on behalf of their official business, ATF assumes that they would not be doing the application during paid work time. Therefore, ATF calculated the monetized value of that time using a standard “leisure wage” formula. For this calculation, ATF used a methodology developed by the Department of Health

and Human Services (HHS). Because HHS's methodology relies on Bureau of Labor Statistics (BLS) data that is updated on a monthly basis, we did not need to use an inflation-adjusted wage rate. Accordingly, consistent with HHS's methodology, we used the BLS median weekly income for full-time employees as the base from which to calculate the hourly leisure wage. Based on this methodology, ATF attributes a rounded value of \$26 per hour to complete the form.

Therefore, the monetized value of the time burden is \$4.34 per request (rounded) (\$26 hourly wage * 0.167 hours).

Table 1. Estimated annualized respondent cost and hour burden

Activity	Number of respondents	Frequency	Total annual responses	Time per response (hours)	Total annual burden (hours)	Hourly rate*	Monetized value of respondent time
Completing Form 20	12,878	1	12,878	0.167	2,151	\$26	\$55,926
Unduplicated totals			12,878	0.167	2,151		\$55,926

The total monetized value of the time burden associated with this collection is \$55,926 (rounded) (2,151 hours * \$26 hourly wage).

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 burden shown in items 12 and 14).

There are no additional costs associated with this information collection.

14. Provide estimates of the annualized cost of 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. In addition, previous mailing costs are no longer incurred due to the form being on eForms.

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

ATF has revised the form to make it electronically fillable and allow it to be submitted by email. In addition, ATF will have made the form part of its online eForms platform by the time this ICR completes the renewal process, both of which result in full electronic submission. In the process of these changes, ATF has also made the second copy automatically auto-fill, when it was previously completed by the respondent in addition to the primary form. ATF also made some additional small edits to the form to make it easier to read, and made a slight revision to the title to clarify the type of transportation covered.

The changes to the form due to updated technology have decreased the time necessary to complete

the form, which was previously 20 minutes (ten minutes were attributed to addressing and mailing) and has now decreased to ten minutes. In addition, respondents no longer incur mailing time and costs. There has also been a decrease in the number of respondents per year, from 20,000 respondents during the last renewal to 12,878 during this renewal, a decrease of 7,122 respondents. These combined changes have resulted in a decrease in total annual burden hours from 6,667 hours to 2,151, a decrease of 4,516 hours, and a corresponding decrease in the monetized time value for this ICR.

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

ATF does 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.

ATF intends to display the OMB expiration date for this information collection.

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.