Department of Justice
Bureau of Alcohol, Tobacco, Firearms and
Explosives Information Collection Request
Supporting Statement
OMB 1140-0104
Application for Alternate Means of Identification of Firearm(s) (Marking Variance) -
ATF Form 3311.4

A. Justification

1. Necessity of Information Collection

The requested information fulfills the requirements of 18 U.S.C. § 923(i), 26 U.S.C. § 5842, and 27 CFR §§ 478.92 and 479.102. Licensed manufacturers and importers must mark firearms manufactured or imported with specific identifying information (approved under OMB #1140-0050). ATF may authorize other means of identification ("marking variance"), upon receipt of a letter application from a licensed manufacturer or importer, showing that such other identification is reasonable, and will not hinder the effective administration of the law.

2. Needs and Uses

Identification marks placed on firearms provide law enforcement personnel the opportunity to better trace crime guns, and allow Federal Firearms Licensees the ability to track their firearm inventories and maintain accurate required records.
Federal regulations at 27 CFR §§ 478.92(a) and 479.102(a), prescribe the requirements for serialization and other identification marks that must appear on firearms. These regulations also provide that the Director may authorize other means of identification, upon receipt of a letter application showing that such other identification is reasonable and will not hinder the effective administration of the firearms regulations.

The Application for Alternate Means of Identification of Firearm(s) (Marking Variance) - ATF Form 3311.4 will satisfy the requirement of a "letter application," which will allow Industry members with a valid Federal importer or manufacturer license, to seek approval to use an alternate means for identifying firearms. Marking Variances are required for licensed manufacturers of firearms, who intend to manufacture and mark firearms on behalf of another licensed manufacturer. In such instances, the contracted manufacturer places the required identifying markings on the frames or receivers, for the manufacturer of record.

3. Use of Information Technology

ATF encourages applicants to submit ATF Form 3311.4 electronically by emailing signed and scanned documents to Marking_Variances@atf.gov. Respondents will receive an automated email confirmation that documents have been received by ATF. This form will be available for download on www.ATF.gov and is e-fillable. Collecting this information

electronically, will reduce postage and printing costs, as well as the amount of time ATF needs to review and process marking variance requests, resulting in more productivity.

4. Efforts to Identify Duplication

ATF uses a uniform subject classification code on all forms to identify duplication, and to ensure that any similar information already available cannot be used or modified for use for the purpose of this information collection.

5. Minimizing Burden on Small Business

This information collection has a minimal impact on small and large businesses.

6. Consequences of Not Conducting or Less Frequent Collection

ATF's efforts to trace crime guns would be hindered without this information collection, Without an established procedure, licensees would be unable to properly submit applications for alternate means of marking variance, or record identifying information such as serial numbers in a uniform manner in their required records. In addition, serial numbers that are stamped very lightly on the frame or receiver of the firearms are more susceptible to being easily obliterated, altered, or removed. Additionally, there will be longer processing time for marking variances that are submitted without all required information as requested on the form.

7. Special Circumstances

This data will be collected in a manner consistent with the guidelines in 5 CFR § 1320.6. Nevertheless, if approved, the variance must be retained permanently with each licensee's records of manufacture, importation or other acquisition.

8. Public Comments and Consultations

The 60-day notice was published in the *Federal Register* on 10/13/2026 (91 FR 64942). The comment period ended on 12/14/2026. ATF received ( ) comments.

9. Provision of Payments or Gifts to Respondents

No payments or gifts will be provided to respondents.

10. Assurance of Confidentiality

With limited exception, Federal law prohibits the disclosure of personally identifiable information (PII) reported on the ATF Form 3311.4. PII information on this form may only be disclosed in accordance with the provisions of the Privacy Act and the Freedom of Information Act, granting Federal, State and local law enforcement officials with a bona fide law enforcement need access to the information (e.g., in relation to an ongoing criminal investigation).

11. Justification for Sensitive Questions

Questions of a sensitive nature are required to facilitate the identification of the Industry member requesting the marking variance (i.e., FFL Number, address, and phone number).

12. Estimate of Respondent's Burden

There are approximately 12,278 small firearms manufacturers and importers. Of these, about 2,064 respondents will utilize ATF Form 3311.4. Each respondent responds once annually per request, so the total responses for this IC is 2,064. It will take approximately 30 minutes to complete the form. The number of burden hours for this portion of the collection is 1,032 hours (2,064 respondents x 1 x .5 (represents ½ hour).

13. Estimate of Cost Burden

The cost burden per response for submitting ATF Form 3311.4 by mail is $0.66 (rate for postage). The cost burden for this portion of the collection is $1,300 (2,064 x $0.66). However, if respondents choose to submit ATF Form 3311.4 by email or fax the cost will be reduced.

14. Cost to the Federal Government

There is no cost burden to the Federal Government.

15. Reason for Change in Burden

No adjustments being made during this renewal; extended without change.

16. Anticipated Publication Plan and Schedule

ATF does not plan to publish information collected.

17. Display of Expiration Date

ATF does not request authorization to omit printing the expiration date on the ATF form 3311.4.

18. Exception to the Certification Statement

There are no exceptions to the certification statement.