

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 10:55 PM
<b>Received:</b> July 07, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945a-ueq7
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0749

Public comment 771. Individual. Barbara Aronowitz. 7-7-18

---

## Submitter Information

**Name:** Barbara Aronowitz

---

## General Comment

I oppose this rule which switches the departments who control the guns, etc.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 10:54 PM
<b>Received:</b> July 07, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945a-m2va
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0748

Public comment 772. Individual. Sharon Flournoy. 7-7-18

---

## Submitter Information

**Name:** Sharon Flournoy

**Address:**

Austin, TX, 78703

**Email:** saflournoy@att.net

**Phone:** 5124723810

---

## General Comment

This seems like a particularly bad idea to me. These firearms are not only for the hunting enthusiast and hobbyist, but are used as weapons of conflict across the world. That would be the purview of the State Department, not the Commerce Dept. I respect the right of American citizens to own guns, but I do not want to provide the gun industry any greater latitude in their lucrative business of selling weapons around the world.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 10:52 PM
<b>Received:</b> July 07, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945a-gi53
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0747

Public comment 773. Individual. Julie Bernstein. 7-7-18

---

## Submitter Information

**Name:** Julie Bernstein

---

## General Comment

Dear State and Commerce Departments,

I am deeply concerned by your proposal to move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

We should learn from our previous mistakes. Even when we have personally trained groups that we considered allied with our cause in the use of weapons, it has come back to haunt us, whether it was in Afghanistan or Central America. It is in our best interest to reduce the availability of dangerous firearms throughout the world rather than escalate it.

Thank you,

Julie Bernstein

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 10:50 PM
<b>Received:</b> July 07, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945a-zaoa
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0746

Public comment 774. Individual. Lauryn Anonymous. 7-7-18

---

## Submitter Information

**Name:** Lauryn Anonymous

---

## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security and safety in other countries, causing more violence, guerrilla and civil wars, and more refugees fleeing to safety at our shores.



# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 10:44 PM
<b>Received:</b> July 07, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945a-bxmo
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant  
Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant  
Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0745

Public comment 775. Anonymous. 7-7-18

---

## Submitter Information

**Name:** Anonymous Anonymous

---

## General Comment

No more guns!

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 3:27 PM
<b>Received:</b> July 07, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945a-3912
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0744

Public comment 776. Individual. Pam Elders. 7-7-18

---

## Submitter Information

**Name:** Pam Elders

**Address:**

P.O. Box 371

P.O. Box 371

Laupahoehoe, HI, 96764

**Email:** nflick@baymoon.com

**Phone:** 8083155188

**Fax:** 96764

---

## General Comment

As a taxpaying, American citizen I am vehemently opposed to this proposed rule change to move the handling of export licenses of semi-automatic assault-type weapons and other powerful firearms from the State Department to the US Commerce Department, Bureau of Industry and Security.

This is foolhardy and clearly not in the interests of national security. Such a move would mean Congress would not be automatically informed of the sale of large caches of firearms to foreign countries. No prudent person would think giving private arms companies the go-ahead to sell dangerous weapons overseas without proper vetting is a good idea. Furthermore, the Bureau of Industry and Security does not have the resources to adequately enforce export controls.

Largely unregulated arms sales could endanger our national interests and security. Lack of oversight would permit arms sales to anyone, including our enemies. Furthermore, why would we want to threaten world stability and undermine our own global diplomacy as well as that of our allies?

I think that trail leads to the National Rifle Association and its lobbyists. This transfer of authority must not be approved; to do so, is to embrace an unethical and inhumane practice which will only smear our international reputation and harm our diplomatic efforts for peace. Please retain administration of export licenses with the State Department. Peace over profits.



# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 10:40 PM
<b>Received:</b> July 07, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945b-5zc9
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0743

Public comment 777. Individual. Carol Carpenter. 7-7-18

---

## Submitter Information

**Name:** Carol Carpenter

---

## General Comment

Please do not change the rules which offer some protection to civilians.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 10:39 PM
<b>Received:</b> July 07, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945b-2svh
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0742

Public comment 778. Individual. M Schwartz. 7-7-18

---

## Submitter Information

**Name:** M Schwartz

---

## General Comment

This is utterly ridiculous to loosen the minimal controls of firearms and related items during a time when it is so apparent that we need stronger laws against sales of certain firearms and increased background checks.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 10:37 PM
<b>Received:</b> July 07, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945b-n711
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0741

Public comment 779. Individual. Sybil Schlesinger. 7-7-18

---

## Submitter Information

**Name:** Sybil Schlesinger

**Address:**

22 Rockland Street  
Natick, MA, 01760

**Email:** sybil.sch@gmail.com

**Phone:** 5084048192

---

## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. We want the U. S. State Department to be focused on safeguarding our nation, not the Commerce Department, focused on the bottom line for gun manufacturers.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 10:35 PM
<b>Received:</b> July 07, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945b-mp5c
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0740

Public comment 780. Individual. Nate Hildebrand. 7-7-18

---

## Submitter Information

**Name:** Nate Hildebrand

---

## General Comment

Guns are not necessary for a comfortable life. They should not be a commodity, they should be likened to a drug that needs to be regulated. People should not be able to kill one another so easily. Especially automatic or semi-automatic style weapons, they are machines of war that should not be available to the public at all, and definitely not sold abroad where they can't be regulated and kept out of terrorist hands.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 10:32 PM
<b>Received:</b> July 07, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945c-wzn5
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0739

Public comment 781. Individual. Susan Richardson. 7-7-18

---

## Submitter Information

**Name:** Susan Richardson

---

## General Comment

The NRA & gun manufacturers are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). My country does NOT need to be in the business of supplying guns around the world! When we can see the distressing result that gun ownership has had on this country, WHY DO WE WISH THIS RESULT ON THEM? No more guns!!



# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 10:30 PM
<b>Received:</b> July 07, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945c-234o
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0738

Public comment 782. Individual. D Arcy Goodrich. 7-7-18

---

## Submitter Information

**Name:** D'Arcy Goodrich

---

## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Please do not approve the proposed change. This change would detract from the protection of our country which should have top priority.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 10:28 PM
<b>Received:</b> July 07, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945c-tn3m
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0737

Public comment 783. Individual. Lee Clapp. 7-7-18

---

## Submitter Information

**Name:** Lee Clapp

**Address:**

824 W. Alice Ave.  
Kingsville, TX, 78363

**Email:** leeclapp@yahoo.com

**Phone:** 361-474-0190

---

## General Comment

I strongly oppose moving oversight of firearm export licensing from the Department of State to the Department of Commerce.

The proposed rule change treats semiautomatic weapons as "non-military," which is absurd. Moreover, the proposed rule eliminates Congressional oversight of gun export deals, transfers the cost of processing licenses from gun manufacturers to tax payers, and enables unchecked gun production in the U.S. and exports abroad by removing the block of 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 10:27 PM
<b>Received:</b> July 07, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945c-6mm5
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0736

Public comment 784. Individual. Meredith Roach. 7-7-18

---

## Submitter Information

**Name:** Meredith Roach

---

## General Comment

I am writing in response to the proposed policy to make it easier to export U.S. guns and ammunition globally and the move of export licensing from the State Department to the Commerce Department. We do not need to make it easier to export guns. There are enough in the world. The only reason for this proposed changes is to benefit the gun lobby. Here are other reasons why this should not happen:

- It treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
- It eliminates Congressional oversight for important gun export deals.
- It transfers the cost of processing licenses from gun manufacturers to taxpayers.
- It removes statutory license requirements for brokers, increasing risk of trafficking.
- It enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.
- The Commerce Department does not have the resources to enforce export controls, even now.
- It reduces transparency and reporting on gun exports.
- It transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

All of these reasons make this policy change ridiculous and terrifying. Please please do not allow this policy to go through. We have enough gun violence all over the world. Why create an even easier path to gun violence and human rights violations?

Thank you,  
Meredith Roach

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 10:25 PM
<b>Received:</b> July 07, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945c-pmgr
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0735

Public comment 785. Individual. Rachel Usdan. 7-7-18

---

## Submitter Information

**Name:** Rachel Usdan

---

## General Comment

I OPPOSE the proposal. It would make America LESS SAFE. The proposal weakens controls over semiautomatic assault weapons including AR-15s and AK-47s, 50 caliber sniper rifles, and high-capacity ammunition magazines. It may also deregulate 3D printing of guns and could ultimately weaken controls on firearm imports. The proposed transfer will likely lead to more U.S. guns getting into the hands of criminal organizations, human rights abusers, and terrorist groups. The proposed rules are a priority for the National Rifle Association and the National Shooting Sports Foundation (the official trade association for the firearms industry) who want to open up international markets to compensate for lagging domestic gun sales.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 10:21 PM
<b>Received:</b> July 07, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945c-lkm1
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0734

Public comment 786. Individual. Mandy Foster. 7-7-18

---

## Submitter Information

**Name:** Mandy Foster

**Address:**

318 Bermuda St  
New Orleans, 70114

**Email:** fosterfest@gmail.com

**Phone:** 5046694357

**Fax:** 70114

---

## General Comment

Please keep the firearms export licensing function within the State Dept. I am a voter and a mother concerned about the conflict of interest posed in transferring this function to the Commerce Dept.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 10:20 PM
<b>Received:</b> July 07, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945d-vk23
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0733

Public comment 787. Individual. DeSean Freeman. 7-7-18

---

## Submitter Information

**Name:** DeSean Freeman

---

## General Comment

In order to accurately and adequately account for the direct correlation between firearms possession and the violence associated with it, 'repeal' the "Dickey Amendment" barring the national Center for Disease Control and Prevention (CDC) from studying firearms violence. Seems simple, does it not?

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 10:18 PM
<b>Received:</b> July 07, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945d-yna0
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0732

Public comment 788. Anonymous. 7-7-18

---

## Submitter Information

**Name:** Anonymous Anonymous

---

## General Comment

Our Kids Lives Mean More Than Your STUPID BLOODY TOYS

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 10:16 PM
<b>Received:</b> July 07, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945d-s049
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0731

Public comment 789. Individual. Anonymous. 7-7-18

---

## Submitter Information

**Name:** Anonymous Anonymous

---

## General Comment

WE need MORE government control of firearms, not less. This proposal is a blatant attempt to increase weapons sales to set even more of the world on fire.



# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 10:14 PM
<b>Received:</b> July 07, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945d-dyur
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0730

Public comment 790. Individual. Julie Buckner. 7-7-18

---

## Submitter Information

**Name:** Julie Buckner

---

## General Comment

I am writing to voice my strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms more dangerous by transferring controls to an agency that prioritizes business interests over national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also concerning. This rule seems designed to create profits for the U.S. gun industry. The rules description of semiautomatic assault rifles like the AR-15 as civilian products is also concerning. These weapons were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. Please do not go forward with this dangerous policy.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 10:12 PM
<b>Received:</b> July 07, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945d-oqsu
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0729

Public comment 791. Individual. Michi Vojta. 7-7-18

---

## Submitter Information

**Name:** Michi Vojta

---

## General Comment

We need FEWER guns, and tighter controls over who gets them. there is no need for automatic or semi-automatic rifles to be readily available, or really any need for basically anyone aside from the military to own/have.

Therefore, I OPPOSE this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 10:11 PM
<b>Received:</b> July 07, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945d-cuo0
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0728

Public comment 792. Individual. Heather Davis. 7-7-18

---

## Submitter Information

**Name:** Heather Davis

**Address:**

Aloha, OR, 97003-2575

**Email:** heatherannedavis@hotmail.com

**Phone:** 5032921926

---

## General Comment

there is not one individual, that is a well trained militia,, therefor guns do warrant control, ban all assault rifles,,

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 10:09 PM
<b>Received:</b> July 07, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945e-i2n5
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0727

Public comment 793. Individual. Heather Tausig. 7-7-18

---

## Submitter Information

**Name:** Heather Tausig

---

## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Not only is this an issue of national security but I believe we have a moral obligation not to export weapons intended to kill other human beings. Our gun record in the United States is abysmal. We have to deal with that here and not export that kind of possibility to other countries ...

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 10:06 PM
<b>Received:</b> July 07, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945e-yusk
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0726

Public comment 794. Individual. Helen Greer. 7-7-18

---

## Submitter Information

**Name:** Helen Greer

---

## General Comment

Gun deaths are an epidemic in the USA. No other industrialized nation has the same problem. That's because they have common sense gun laws. We need them too.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 10:00 PM
<b>Received:</b> July 07, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945e-u4xq
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0725

Public comment 795. Anonymous. 7-7-18

---

## Submitter Information

**Name:** Anonymous Anonymous

---

## General Comment

I oppose the rule change that would shift the handling of firearm exports from the U.S. State Department to the Commerce Department. It is unnecessary and will only serve to help terrorists.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 9:57 PM
<b>Received:</b> July 07, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945e-dqtk
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0724

Public comment 796. Individual. Madhav Vishnubhatta. 7-7-18

---

## Submitter Information

**Name:** Madhav Vishnubhatta

**Address:**

2, Fairgate Drive  
Stamford, CT, 06902

**Fax:** 06902

---

## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This rule would only lead to these firearms that are moved out of the USML list to be sold internationally for profit and thus exporting the problems that USA faces due to widespread gun ownership. Hence please do not proceed on this rule.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 9:55 PM
<b>Received:</b> July 07, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945e-6hwm
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0723

Public comment 797. Individual. Debbie Lyman. 7-7-18

---

## Submitter Information

**Name:** Debbie Lyman

---

## General Comment

I believe the USML should remain as it is now. The rule change from State to Commerce is dangerous and should not be implemented.

The change would facilitate firearm exports landing in terrorist or criminal organizations and into the hands of repressive regimes. This must be stopped for international safety concerns and not be done by a presidential whim.



# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 9:53 PM
<b>Received:</b> July 07, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945e-c3mc
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0722

Public comment 798. Individual. Barbara Flores. 7-7-18

---

## Submitter Information

**Name:** Barbara Flores

---

## General Comment

Americans make up 4% of the world's population, and we own close to half of the world's civilian guns. We have the NRA to thank for this situation. I do not want them to export their toxic craziness.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 9:51 PM
<b>Received:</b> July 07, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945f-lqqn
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0721

Public comment 799. Individual. Kelly deRosier. 7-7-18

---

## Submitter Information

**Name:** Kelly deRosier

**Address:** United States,

---

## General Comment

How many more people need to die before we acknowledge that the sale of guns is out of control. The president is in bed with the NRA. I will not vote for any candidate who takes NRA money. I a man donating to candidates who want sensible gun control, registration, etc.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 9:49 PM
<b>Received:</b> July 07, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945f-yye7
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0720

Public comment 800. Individual. Vicki Brown. 7-7-18

---

## Submitter Information

**Name:** Vicki Brown

---

## General Comment

Why in the world are you considering this? I vehemently oppose the switch of regulations of firearms from the State Dept. to the Commerce Dept. I can just imagine the cheering of the firearm traffickers, organized crime, terrorists and others if this is done. The world is already a dangerous place. You really don't need to help make it worse. Please put a stop to this insanity just to make some people richer.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 9:32 PM <b>Received:</b> July 07, 2018 <b>Status:</b> Posted <b>Posted:</b> July 13, 2018 <b>Tracking No.</b> 1k2-945f-hskl <b>Comments Due:</b> July 09, 2018 <b>Submission Type:</b> Web
--

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0719

Public comment 801. Individual. Marilyn Duerbeck. 7-7-18

---

## Submitter Information

**Name:** Marilyn Duerbeck

**Address:**

1747 e northern ave  
Phoenix, AZ, 85020

**Email:** Mduer71704@aol.com

**Phone:** 602-371-9150

---

## General Comment

I oppose this rule change. This is not a good idea.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 9:30 PM
<b>Received:</b> July 07, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945f-pooa
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0718

Public comment 802. Individual. Concerned DC resident and US citizen. 7-8-18

---

## Submitter Information

**Name:** Anonymous Anonymous

---

## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. We have seen the terrible impact of the for-profit gun lobby in the US. We cannot expand the tragedies of mass shootings and increased fatal suicides and violent domestic abuse with a firearm to other countries, which is exactly what will happen if firearms, guns, ammunition, and related articles are governed by Commerce rather than State.

Signed,

A concerned DC resident and US citizen

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 9:27 PM
<b>Received:</b> July 07, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945f-unqs
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0717

Public comment 803. Individual. David Grant. 7-8-18

---

## Submitter Information

**Name:** David Grant

---

## General Comment

Another citizen opposed to moving supervision of firearms/ ammunition regulations from the State Department to the Commerce Department. What are you thinking? Commerce is about selling things, generally to foreign markets. Are we only interested in promoting sales of firearms and ammunition? The State Department has been and obviously continues to be the agency of choice in this matter.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 9:26 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945g-t834
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0716

Public comment 804. Individual. Cheryl Dzubak. 7-8-18

---

## Submitter Information

**Name:** Cheryl Dzubak

---

## General Comment

I am opposed to the Trump administration proposal to make it easier to export U.S. guns and ammunition globally, even though U.S.- exported firearms are already used in many crimes, attacks and human rights violations in many other nations. These are the reasons that I am concerned:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

The Trump administration proposal applies to assault weapons and other powerful firearms, moving export licenses from the State Department to the Commerce Department. The U.S. gun lobby has advocated for these policies. The Department of Commerce estimates that the transfer of authority will increase the number of export applicants by 10,000 annually. The fact that this proposal applies to assault weapons and other powerful firearms typically used in the military is concerning in that terrorist organizations may be able to easily get their hands on these weapons. We do not need to increase the potential use of weapons whether they are here or exported abroad. Thank you for your consideration of this serious matter.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 9:24 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945g-xqjs
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0715

Public comment 805. Individual. Bertino Marro. 7-8-18

---

## Submitter Information

**Name:** Bertino Marro

**Address:**

578 10th St.

Brooklyn, NY, 11215

**Email:** bertmarro@hotmail.com

---

## General Comment

How about appointing a "literalist" to the Supreme Court? A judge who can tell the difference between the rights of "a well organized militia" from the rights of an ordinary citizen under that beloved second amendment to the Constitution so often (mis)applied by the American gun community?



# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 9:22 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945h-1vyv
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0714

Public comment 806. Individual. Eric Stordahl. 7-8-18

---

## Submitter Information

**Name:** Eric Stordahl

---

## General Comment

I oppose loosening any regulations on firearms. I support making firearm regulation more stringent.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 9:20 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945i-xod7
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0713

Public comment 807. Texas Gun Sense. Kim LeBlanc. 7-8-18

---

## Submitter Information

**Name:** Kim LeBlanc

**Organization:** Texas Gun Sense

---

## General Comment

I oppose the proposed rule change because it will do the following:

- Treat semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
- Eliminate Congressional oversight for important gun export deals.
- Transfer the cost of processing licenses from gun manufacturers to taxpayers.
- Remove statutory license requirements for brokers, increasing risk of trafficking.
- Reduce or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.
- Enable unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.
- The Commerce Department does not have the resources to enforce export controls, even now.
- Reduce transparency and reporting on gun exports.
- Transfer gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

Please oppose the proposed rule change. This matter was brought to my attention by Texas Gun Sense. Our country does not need reckless laws and rule changes such as these that undermine common sense gun safety. Thank you.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 9:17 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945i-9s26
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0712

Public comment 808. Individual. Kathleen McHendry. 7-8-18

---

## Submitter Information

**Name:** Kathleen McHendry

---

## General Comment

This is quite possibly the most dangerous idea that will affect all countries safety that I have read about in a while. It would be equivalent to advertising for people to commit more acts of violence because of the ease with which it would become to acquire sophisticated assault weapons. The only entities that benefit from such a reckless change of managing departments are the gun manufacturers. The implications of this are so catastrophic and wide ranging that the anticipated potential should be criminal and therefore halted.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 9:15 PM <b>Received:</b> July 08, 2018 <b>Status:</b> Posted <b>Posted:</b> July 13, 2018 <b>Tracking No.</b> 1k2-945m-ugm3 <b>Comments Due:</b> July 09, 2018 <b>Submission Type:</b> Web
--

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0711

Public comment 809. Anonymous. 7-8-18

---

## Submitter Information

**Name:** Anonymous Anonymous

---

## General Comment

NO on this proposed rule which will only benefit special interests who are lobbying with money and influence and will not benefit the people and children of this county. Really, Mr. President? Drain the swamp? NO, not with this twisted and immoral "proposal." NO!

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 9:12 PM <b>Received:</b> July 08, 2018 <b>Status:</b> Posted <b>Posted:</b> July 13, 2018 <b>Tracking No.</b> 1k2-945m-z3wa <b>Comments Due:</b> July 09, 2018 <b>Submission Type:</b> Web
--

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0710

Public comment 810. Individual. M.A. Whelan M.D. 7-8-18

---

## Submitter Information

**Name:** M.A. Whelan M.D.

**Address:**

241 County Highway 28  
Cooperstown, 13326-2703

**Email:** mawhelan@capital.net

**Phone:** 6075475203

**Fax:** 13326-2703

---

## General Comment

The Commerce Dept. should not be in control of the sale/export of guns, ammunition, and related articles. This is more important than simply commercial transaction! Indiscriminate dissemination of weapons should not be allowed. Sincerely, M.A. Whelan MD

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 9:08 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945n-vc3p
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0709

Public comment 811. Individual. Emeline Crawford. 7-8-18

---

## Submitter Information

**Name:** Emeline Crawford

---

## General Comment

I am opposed to giving the Commerce Department the responsibility for international gun sales. This country should not be pushing gun sales internationally.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 9:07 PM <b>Received:</b> July 08, 2018 <b>Status:</b> Posted <b>Posted:</b> July 13, 2018 <b>Tracking No.</b> 1k2-945n-5o0k <b>Comments Due:</b> July 09, 2018 <b>Submission Type:</b> Web
--

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0708

Public comment 812. Individual. A. S. 7-8-18

---

## Submitter Information

**Name:** A. S.

---

## General Comment

Please stop the NRA backed rule and re-consider how your proposed regulations will change the face of safety in our society using the following points:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

I am the mother of 5 children who deserve to be safe and protected. Please stop this!  
A.S.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 9:05 PM <b>Received:</b> July 08, 2018 <b>Status:</b> Posted <b>Posted:</b> July 13, 2018 <b>Tracking No.</b> 1k2-945n-scps <b>Comments Due:</b> July 09, 2018 <b>Submission Type:</b> Web
--

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0707

Public comment 813. Individual. James Rice. 7-8-18

---

## Submitter Information

**Name:** James Rice

---

## General Comment

Hello,

If you're being mugged and you have a gun, would you hand it over to them? President Trump's proposal to lift the current regulations exports seems to be doing the same thing. I believe the the inherently military nature of these firearms means that the sale of them is an issue of national security. I feel very strongly that the gun export laws should stay as they are. Why would we make it easier for potential terrorists or international criminals to obtain lethal weapons?

Thank you for your time.



# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 9:03 PM <b>Received:</b> July 08, 2018 <b>Status:</b> Posted <b>Posted:</b> July 13, 2018 <b>Tracking No.</b> 1k2-945n-irfu <b>Comments Due:</b> July 09, 2018 <b>Submission Type:</b> Web
--

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0706

Public comment 814. Individual. Adriana Carr. 7-8-18

---

## Submitter Information

**Name:** Adriana Carr

**Address:**

2835 New Providence Court

Falls Church, VA, 22042

**Email:** adriana.carr341@gmail.com

**Phone:** 7033807154

---

## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Adriana Carr

2835 New Providence Court

Falls Church, VA 22042

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 9:02 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945n-i7lk
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0705

Public comment 815. Individual. Kathleen Brady. 7-8-18

---

## Submitter Information

**Name:** Kathleen Brady

**Address:**

5053 Cobblestone Rd  
WINSTON SALEM, 27106

**Email:** kabmhb@gmail.com

**Phone:** 3369224289

---

## General Comment

I am a tax-paying citizen who is concerned about the consequences of this proposed rule change.

Please consider other alternatives to this proposed rule that would:

1. Eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. Remove licensing requirements for brokers, increasing the risk of trafficking.
3. Remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 9:00 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945o-zmpz
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0704

Public comment 816. Anonymous. 7-8-18

---

## Submitter Information

**Name:** Anonymous Anonymous

---

## General Comment

The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry.

We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms.

Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 8:58 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945o-uy1w
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0703

Public comment 817. Individual. Harriet Solomon. 7-8-18

---

## Submitter Information

**Name:** Harriet Solomon

---

## General Comment

The proposed changes in the rule regarding international arms regulations are RECKLESS. Lives around the world will be endangered by international and domestic criminals. It boggles the mind that an American administration can be so blind to the effect of these changes on the freedom of the traveling public to go anywhere without fear of gun violence; on the freedom of Americans to go about their business in their own country; and on the general safety of the world at large.

Please do not change these rules so drastically. They've been in place since 1940; they still work. You are hurting us, your constituents whom you promised and swore and oath to protect against all enemies, foreign and domestic. These rule changes violate that oath on every ground.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 8:56 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945o-6ov1
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0702

Public comment 818. Individual. Suzanne Napier. 7-8-18

---

## Submitter Information

**Name:** Suzanne Napier

**Address:**

603N Tumbleweed

Austin, TX, 78733

**Email:** snapier603@gmail.com

**Phone:** 5122632206

---

## General Comment

I oppose this proposed rule for the following reasons, and for my belief that will make our world even for violent. Congress is shirking their responsibility to protect the American people.

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 8:54 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945o-z325
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0701

Public comment 819. Individual. Kathryn Jones. 7-8-18

---

## Submitter Information

**Name:** Kathryn Jones

**Address:**

320 E Waring Ave  
State College, PA, 16801

**Email:** katie.trail@gmail.com

**Phone:** 8143089392

---

## General Comment

I am against this change, as I find it to be an issue of national security; switching the regulation of firearms exports from the State Department to the Commerce Department is a dangerous proposal.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 8:53 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945o-4hhr
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0700

Public comment 820. Individual. Carol Ortiz. 7-8-18

---

## Submitter Information

**Name:** Carol Ortiz

**Address:**

256 Mesa Vw  
Montgomery, TX, 77316

**Email:** mazola0523@yahoo.com

**Phone:** 9364431848

---

## General Comment

I strongly oppose this proposal to transfer the oversight of weapons export from the State Dept. to the Commerce Dept. The change is only for the benefit of the gun manufacturers to increase their profits and to weaken law enforcement over firearms trafficking to shady gun dealers. The security of civilian citizens here and abroad would be at increased risk for the following reasons.

The proposed change treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 8:51 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945p-5t3u
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0699

Public comment 821. Anonymous. 7-8-18

---

## Submitter Information

**Name:** Anonymous Anonymous

---

## General Comment

Weapons which will be exported need to be under the purview of the US State Department.



# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 8:49 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945p-5oyd
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0698

Public comment 822. Individual. Lawrence Turk. 7-8-18

---

## Submitter Information

**Name:** Lawrence Turk, RN

**Address:**

POB 203

Hendersonville, NC, 28793

**Email:** butch@wildrockies.org

---

## General Comment

No, dont loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals.

The proposed rule appears to be largely driven by the interests of industry.

The proposed rule does not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. Also, the proposed rule fails to recognize the inherently military nature of many of the relevant firearms.

Dont eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

Dont remove licensing requirements for brokers, increasing the risk of trafficking.

Dont remove the State Departments block on the 3D printing of firearms.

Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 8:47 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945p-pnvv
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0697

Public comment 823. Individual. Julie Lang. 7-8-18

---

## Submitter Information

**Name:** Julie Lang

---

## General Comment

We must do everything we can to limit access to guns in America, especially military assault weapons. This is a ridiculous epidemic, and will be a black scar in American history. Do the right thing and protect our citizens and our students!

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 8:45 PM <b>Received:</b> July 08, 2018 <b>Status:</b> Posted <b>Posted:</b> July 13, 2018 <b>Tracking No.</b> 1k2-945p-86zg <b>Comments Due:</b> July 09, 2018 <b>Submission Type:</b> Web
--

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0696

Public comment 824. Individual. George Shafer. 7-8-18

---

## Submitter Information

**Name:** George Shafer

---

## General Comment

This rule would make it much more dangerous for Americans traveling abroad, especially when Trump has made so many enemies around the world with his bullying.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 8:43 PM <b>Received:</b> July 08, 2018 <b>Status:</b> Posted <b>Posted:</b> July 13, 2018 <b>Tracking No.</b> 1k2-945p-cbxn <b>Comments Due:</b> July 09, 2018 <b>Submission Type:</b> Web
--

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0695

Public comment 825. Individual. Colleen Shearer. 7-8-18

---

## Submitter Information

**Name:** Colleen Shearer

---

## General Comment

I am against a Trump Administration rule change to make it easier for U.S. gun manufacturers and dealers to export guns and ammunition globally.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 8:41 PM <b>Received:</b> July 08, 2018 <b>Status:</b> Posted <b>Posted:</b> July 13, 2018 <b>Tracking No.</b> 1k2-945p-bphw <b>Comments Due:</b> July 09, 2018 <b>Submission Type:</b> Web
--

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0694

Public comment 826. Individual. Frances Elsemore. 7-8-18

---

## Submitter Information

**Name:** frances elsemore

**Address:**

28 beechstone, apt 2  
portsmouth, NH, 03801

**Email:** f.elsemore@gmail.com

---

## General Comment

In issues relating to weapons, the priority should be safety, not profit.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 8:39 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945p-4gl1
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0693

Public comment 827. Individual. Denise Bullock. 7-8-18

---

## Submitter Information

**Name:** Denise Bullock

---

## General Comment

I vehemently opposed moving regulation of firearms export to the U.S. Commerce Department. Firearms are far from ordinary exports. Our responsibility is not to make money but to ensure safety. We do not need to export our appallingly high death rates from firearms.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 8:37 PM <b>Received:</b> July 08, 2018 <b>Status:</b> Posted <b>Posted:</b> July 13, 2018 <b>Tracking No.</b> 1k2-945q-a11x <b>Comments Due:</b> July 09, 2018 <b>Submission Type:</b> Web
--

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0692

Public comment 828. Anonymous. 7-8-18

---

## Submitter Information

**Name:** Anonymous Anonymous

---

## General Comment

We have to keep these regulations! It helps keep people safe.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 8:33 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945q-uxeq
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0691

Public comment 829. Individual. Martin Washburn. 7-8-18

---

## Submitter Information

**Name:** Martin Washburn

---

## General Comment

Deregulation of weapons sales allows for the sale of weapons to a second buyer. This allows the weapons to be procured by terrorist organizations we are trying to stop. This benefits the military individual complex and the never-ending war but reduces national security.



# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 8:31 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945q-cdo0
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0690

Public comment 830. Individual. Mary Goodkind. 7-8-18

---

## Submitter Information

**Name:** Mary Goodkind

**Address:**

23 Ridgefield Pl  
Billtmore Forest, 28803

**Email:** mary@lindleyg.com

**Phone:** 8284247151

---

## General Comment

The Trump administration proposes changes to the agreements affecting the sale of weapons abroad, changes that I believe would make the world a more dangerous place. Please don't value commercial gain as more important than keeping all of us safe.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Please do not dismantle important protections that have served us well and that we still need.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 8:24 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945q-f01i
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0689

Public comment 831. Anonymous. 7-8-18

---

## Submitter Information

**Name:** Anonymous Anonymous

---

## General Comment

The proposed rule would loosen regulatory oversight of the export of firearms. Other than increasing the profits of arms manufacturers and distributors, there is no plausible rationale for reducing such oversight. Now more international terrorists, drug traffickers, and other kinds of criminals will have access to weaponry they shouldn't have. This is an ill-considered, dangerous rule, one that should not be implemented.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 8:21 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945q-j5o8
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0688

Public comment 832. Individual. Rachel Lee. 7-8-18

---

## Submitter Information

**Name:** Rachel Lee

**Address:**

2221 N Cardillo Ave

Palm Springs, 92262

**Email:** raquel\_lee@icloud.com

---

## General Comment

We know that gun violence spreads like a virus, from one person/family to another and across communities and states. Simply being close to a gun increases the chances that you will be harmed, domestic violence, suicide or accidentally. Gun violence is an epidemic in America, spreading like a wildfire in California. Please don't export this violence to other countries which would make gun violence a pandemic, like the deadly flu in 1918. It was not a disease that could be controlled. This violence will circle back through America ten-fold and may revisit it's deadly effect on you or your family.

As a physician, I stabilize patients using the ABCs first, Airway, Breathing, Circulation, the most necessary functions to keep one's body alive. Sometimes that means we don't treat the cause of their emergency first. We stabilize the airway so they can get air in, we ensure they can oxygenate effectively and then we make sure their heart is working and their blood pressure is adequate to perfuse the brain. Once we know those major organs are taken care of, we can begin to search for a cause. First, we have to buy ourselves time to work. We can continue to about the causes of gun violence but first we have to stop the gun deaths and stabilize the situation to give ourselves time to come up with reasonable plans. For now, stop spreading the gun violence by making more guns, transporting more guns and making it easier to get guns, even temporarily.

Ideally, if at least temporarily, HALT gun sales. There are more than enough guns on the market for people to sell to each other. Let's discuss this without all the rhetoric, without the NRA. Let's look at the science. Don't spread this epidemic. ABCs, stop the bleeding.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 2:43 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945q-w9do
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0674

Public comment 833. Individual. Karen Puffett. 7-8-18

---

## Submitter Information

**Name:** Karen Puffett

---

## General Comment

I am very OPPOSED to the proposed regulation to move the firearms exports from the State Department to the Department of Commerce.

The State Departments oversight and regulatory authority is critical to our countrys safety by monitoring weapons domestically and those coming into this country. Since most types of firearms can be used for military and terrorist activities and they should remain under the scrutiny of the Department of State for our protection rather than Department of Commerce for promoting export of our goods with little oversight.

If the regulatory rule is changed, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns.

Additionally, the Commerce Department just does not have the resources to adequately enforce export controls which means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. The end result is firearms will be exported to anyone with money.

For the safety of the people of our country and the world, PLEASE DO NOT approve this move.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 2:41 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945q-zdjk
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0671

Public comment 834. Individual. Cheryl Hanks-Hicks. 7-8-18

---

## Submitter Information

**Name:** Cheryl Hanks-Hicks

**Address:**

Eugene, OR, u

**Email:** Cherylhicks@yahoo.com

---

## General Comment

This maybe the worst idea that has come out of this administration. Firearms, guns, weapons, and amunitions, among other related issues have absolutely no place being controlled/ regulated by the Commerce Department! Where else would you put guns, weapons, and amunitions accept under the United States MUNTIONS List, duh? The sale, transfer, and control of these items are definitely a reasonable threat to our security! Please, leave these on the Munitions List, where they most certainly belong!

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 2:40 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945r-305w
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0670

Public comment 835. Individual. Michael Sklar. 7-8-18

---

## Submitter Information

**Name:** Michael Sklar

**Address:**

13301 Ludlow Avenue  
Huntington Woods, MI, 48070

**Email:** mssklar62@gmail.com

**Phone:** 2485421789

**Fax:** 48070

---

## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It violates the legal strictures governing the United States Munitions List. It exceeds the Administration's authority delegated to it by Congress. It subordinates the national interest to the economic interests of firearms manufacturers by moving administration of these regulations to a Cabinet department whose mission is trade promotion and business sales.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 2:38 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945r-52fl
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0669

Public comment 836. Individual. K. Worrell. 7-8-18

---

## Submitter Information

**Name:** K. Worrell

---

## General Comment

There are two major problems with this rule change moving the handling of export licenses of semiautomatic assault and other firearms from the U.S. State Department to the U.S. Commerce Department. First, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security. Second, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere.

This rule change would, therefore, make it much easier for firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous groups and organizations to obtain large caches of American guns and ammo with which to commit their horrendous crimes.

This rule change should not take place in the best interests of both American security and moral conscience.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 2:36 PM <b>Received:</b> July 08, 2018 <b>Status:</b> Posted <b>Posted:</b> July 13, 2018 <b>Tracking No.</b> 1k2-945r-p6tk <b>Comments Due:</b> July 09, 2018 <b>Submission Type:</b> Web
--

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0668

Public comment 837. Individual. Carole Bassett. 7-8-18

---

## Submitter Information

**Name:** Carole Bassett

---

## General Comment

I am opposed to the proposed rule: Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the US Munitions List. I am concerned about moving the control of firearms, etc. to the Commerce Dept. and I also share the concerns voiced by Amnesty International regarding fears of escalating problems associated with entities responsible for human rights violation. Please keep control of the firearms, guns, etc. list with the State Department.

Carole Bassett, Ph.D.



# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 2:35 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945s-tt4p
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0667

Public comment 838. Individual. Rachael Brown. 7-8-18

---

## Submitter Information

**Name:** Rachael Brown

---

## General Comment

Dear BIS:

I oppose the proposed rule for the following reasons:

The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey.[2] Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention.[3] The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking. The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing weapons,

the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms in the U.S. and around the globe. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could generate many preventable tragedies.

The Commerce Department does not have resources to enforce export controls, even before the addition of 10,000 firearms export license applicants as a result of this rule predicted by Commerce.[4] The BISs enforcement office, with no staff in Latin America, Africa, or many other parts of the world, is not equipped to take the same level of preventive measures for end-use controls. Moreover, the State Department has developed extensive data, expertise and institutional relations to implement the Leahy Law for security assistance, which can serve as a critical foundation in both pre-license and post-shipment checks to control and verify end uses and end users. Commerce does not have these resources.

The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.

This rule would transfer gun export licensing to an agency the Commerce Department whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in countries that are responsible for most of the increasing and record levels of homicides.[5] The export of these weapons should be subject to more controls, not less.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 2:33 PM <b>Received:</b> July 08, 2018 <b>Status:</b> Posted <b>Posted:</b> July 13, 2018 <b>Tracking No.</b> 1k2-945s-m7l9 <b>Comments Due:</b> July 09, 2018 <b>Submission Type:</b> Web
--

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0664

Public comment 839. Individual. Jennifer Holt. 7-8-18

---

## Submitter Information

**Name:** Jennifer Holt

---

## General Comment

Gun Reform and control of access to guns&ammunition must apply to those posing a public safety threat! This is not a Second Amendment nullification rather it is an enforcement of our Founding Fathers Declared Rights of " Life,Liberty and the Pursuit of Happiness ".

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 2:31 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945s-oy26
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0662

Public comment 840. Individual. Hannah Siegel. 7-8-18

---

## Submitter Information

**Name:** Hannah Siegel

---

## General Comment

I strongly oppose this proposed rule, as it would make it easier for the US to export lethal weaponry and firearms. Whether intentionally or unintentionally, U.S.-made weapons often fall into the hands of global arms traffickers. Whether in Yemen, Niger, or Mexico, malicious actors such as terrorists, gangs, and cartels use these American products to sow fear and instability. Please, for the betterment of world security and the American reputation, do not allow this proposed rule to go forward.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 2:30 PM <b>Received:</b> July 08, 2018 <b>Status:</b> Posted <b>Posted:</b> July 13, 2018 <b>Tracking No.</b> 1k2-945s-ejxz <b>Comments Due:</b> July 09, 2018 <b>Submission Type:</b> Web
--

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0661

Public comment 841. Individual. Eugene Crook. 7-8-18

---

## Submitter Information

**Name:** Eugene Crook

---

## General Comment

First, we should not be exporting anything to any country where it is currently against the law to own or possess such an item. This action would undermine that country's right to their own sovereign rule.  
Second, we have become the leading nation in the world in gun deaths, and we do not want to export that disease to any other country in the world.  
Third, exporting these items will create enemies and the US at this point needs friends, not new enemies.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 2:24 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945t-yz07
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0660

Public comment 842. Individual. Virgene Link-New. 7-8-18

---

## Submitter Information

**Name:** Virgene Link-New

---

## General Comment

To Whom It May Concern:

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. We do not need to be making money by supplying arms to the world. We do not want to promote warfare, killing and poaching, which is what guns lead to.

Let's make money by exporting wholesome technology, like green power, or medical equipment. Thank you.

Virgene Link-New

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 2:21 PM <b>Received:</b> July 08, 2018 <b>Status:</b> Posted <b>Posted:</b> July 13, 2018 <b>Tracking No.</b> 1k2-945u-5ztj <b>Comments Due:</b> July 09, 2018 <b>Submission Type:</b> Web
--

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0657

Public comment 843. Individual. Bobbie Huskey. 7-8-18

---

## Submitter Information

**Name:** Bobbie Huskey

---

## General Comment

we need common sense gun reform such as background checks, preventing mentally ill and violent domestic partners from purchasing guns, preventing the sales of guns on line.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 2:17 PM <b>Received:</b> July 08, 2018 <b>Status:</b> Posted <b>Posted:</b> July 13, 2018 <b>Tracking No.</b> 1k2-945u-3van <b>Comments Due:</b> July 09, 2018 <b>Submission Type:</b> Web
--

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0652

Public comment 844. Individual. Gerri Horka. 7-8-18

---

## Submitter Information

**Name:** Gerri Horka

**Address:**

325 Pepper Avenue  
Hillsborough, CA, 94010

---

## General Comment

I am in ABSOLUTE opposition to this proposed change!



# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 2:15 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945u-t3kl
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0643

Public comment 845. Individual. B. Roxanne Taylor. 7-8-18

---

## Submitter Information

**Name:** B. Roxanne Taylor

---

## General Comment

Please block the administration's proposed rule that would loosen exports of firearms which could end up in the hands of criminals & terrorists. These weapons could then be used against US citizens.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 2:05 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945u-9hsz
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0642

Public comment 846. Individual. Hannah Sholder. 7-8-18

---

## Submitter Information

**Name:** Hannah Sholder

---

## General Comment

I oppose relaxing firearm export rules.

# PUBLIC SUBMISSION

<b>As of:</b> 7/18/18 4:48 PM
<b>Received:</b> July 06, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 18, 2018
<b>Tracking No.</b> 1k2-944m-n5w0
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1747

Public Comment 847. Individual. Alena Jorgensen. 7-4-18.

---

## Submitter Information

**Name:** Alena Jorgensen

**Address:**

Temple City, CA, 917801651

**Email:** aj.1156@yahoo.com

**Phone:** 6266148615

---

## General Comment

STOP trying to kill off the surplus population.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 1:45 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945v-xlu5
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0634

Public comment 848. Individual. Jill Van Vlack. 7-8-18

---

## Submitter Information

**Name:** Jill Van Vlack

---

## General Comment

Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries.[5] The export of these weapons should be subject to more controls, not less.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 1:38 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945v-jq6h
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0632

Public comment 849. Individual. EM Ryan. 7-8-18

---

## Submitter Information

**Name:** EM Ryan

---

## General Comment

As a responsible American citizen, I very much oppose any change that would move regulations of firearm or other weapon exports from the U.S. Department of State to the U.S. Department of Commerce. The U.S. has by far the world's highest rate of gunshot death and injury, including suicide, homicide, and accident. The rest of the world doesn't want our violent statistics, our guns, our fear, our pain. The rest of the world certainly doesn't want or need our semiautomatic weapons or firearms that can be converted to semiautomatic weapons. Say no to any such change.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 1:36 PM <b>Received:</b> July 08, 2018 <b>Status:</b> Posted <b>Posted:</b> July 13, 2018 <b>Tracking No.</b> 1k2-945v-bfxw <b>Comments Due:</b> July 09, 2018 <b>Submission Type:</b> Web
--

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0631

Public comment 850. Individual. T Schicker. 7-8-18

---

## Submitter Information

**Name:** T Schicker

---

## General Comment

I oppose the rule change of export of firearms to the commerce department. I am concerned about the security crisis this could cause as more firearms are sold internationally.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 1:34 PM <b>Received:</b> July 08, 2018 <b>Status:</b> Posted <b>Posted:</b> July 13, 2018 <b>Tracking No.</b> 1k2-945v-jtka <b>Comments Due:</b> July 09, 2018 <b>Submission Type:</b> Web
--

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0630

Public comment 851. Individual. Michael Golen. 7-8-18

---

## Submitter Information

**Name:** michael golen

---

## General Comment

I am opposed to lessening restrictions on gun purchases.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 1:26 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945w-mtyl
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0628

Public comment 852. Individual. Melanie Greene. 7-8-18

---

## Submitter Information

**Name:** Melanie Greene

---

## General Comment

As a gun-owning taxpayer, I am very concerned about this proposed change in policy. I'm especially concerned that this change eliminates Congressional oversight for important gun export deals. It reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and eliminates registration of firearms exporters, a requirement since the 1940s.

The Commerce Department does not have the resources to enforce export controls, even now. It reduces transparency and reporting on gun exports. It transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade. This does not seem to be in humanity's or our country's best interests.



# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 1:24 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945w-rc81
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0627

Public comment 853. Individual. Kathy Bradley. 7-8-18

---

## Submitter Information

**Name:** Kathy Bradley

---

## General Comment

I vehemently oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. International firearms sales must remain classified as "military" and therefore under regulation by the State Department, so that Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, or to countries where there are serious human rights concerns.

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. This would create an unacceptable proliferation of firearms in the hands of dangerous groups. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Further, the rule change would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Given the issues with gun violence and the trump Administration's attitude against immigration, this rule change would make two extremely bad situations much worse.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 1:22 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945w-v2y5
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0626

Public comment 854. Individual. Nina Austin. 7-8-18

---

## Submitter Information

**Name:** Nina Austin

**Address:**

62 Seneca East

Hawthorn Woods, IL, 60047

**Email:** ninaaustin@hotmail.com

---

## General Comment

I am writing in strong opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 1:20 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945w-kbg7
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0625

Public comment 855. Individual. Nancy Borelli. 7-8-18

---

## Submitter Information

**Name:** Nancy Borelli

**Address:**

Santa Rosa Va, CA, 93012

**Email:** nancyborelli@gmail.com

**Phone:** 8059076523

---

## General Comment

I oppose switching the regulation of the export of firearms from the State Department to the Department of Commerce. This is purely a political move to benefit the gun lobby and gun manufacturers and retailers and poses a huge risk for safety of the people. Do not switch the oversight of the export of firearms to the Department of Commerce.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 1:19 PM <b>Received:</b> July 08, 2018 <b>Status:</b> Posted <b>Posted:</b> July 13, 2018 <b>Tracking No.</b> 1k2-945w-qoq7 <b>Comments Due:</b> July 09, 2018 <b>Submission Type:</b> Web
--

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0624

Public comment 856. Individual. Holly Dowling. 7-8-18

---

## Submitter Information

**Name:** Holly Dowling

**Address:**

2481 Vineyard Rd  
Novato, CA, 94947

**Email:** hollyd1225@gmail.com

**Phone:** 7072874409

---

## General Comment

I am strongly opposed to this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This is not in the best interests of the American public. Thank you.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 1:16 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945x-b0na
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0623

Public comment 857. Individual. Julia Glover. 7-8-18

---

## Submitter Information

**Name:** Julia Glover

**Address:**

7292 Maxwellton Road

Clinton, 98236

**Email:** julieg@whidbey.com

**Phone:** 3605793665

---

## General Comment

No, no, NO!!!! This rule change would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. I EXTREMELY STRONGLY OPPOSE this rule change which would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. For God's sake, WHAT ARE YOU THINKING????

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 1:13 PM <b>Received:</b> July 08, 2018 <b>Status:</b> Posted <b>Posted:</b> July 13, 2018 <b>Tracking No.</b> 1k2-945x-eb8o <b>Comments Due:</b> July 09, 2018 <b>Submission Type:</b> Web
--

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0621

Public comment 858. Individual. Linda Koenig. 7-8-18

---

## Submitter Information

**Name:** Linda Koenig

---

## General Comment

I oppose the change of the regulation of semi-automatic assault weapons and other firearms, and guidelines passed from the United States State Department to the Department Of Commerce. I think this is a very bad idea, and could increase the probability of these items passing to people who could harm Americans abroad. I don't think the Dept. of Commerce has the manpower, or ability to regulate and administer these transactions in a precise and thorough manner.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 1:09 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945x-eirm
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0616

Public comment 859. Individual. Amanda Wilcox. 7-8-18

---

## Submitter Information

**Name:** Amanda Wilcox

**Address:**

Penn Valley, CA, 95946

**Email:** amandawilcox@live.com

---

## General Comment

My 19 year old daughter was killed in a rampage shooting in 2001, so I know full well the tragic toll of gun violence. I also know that Americas gun homicide rate is more than 25 times the average of other high-income countries.

An analysis of gun homicide rates in developed countries those considered high-income by the World Bank found that the United States accounted for 46 percent of the population but 82 percent of the gun deaths.

The current proposal by the Trump administration would it easier to export U.S. guns and ammunition globally. I strongly object to America arming the world, especially with assault weapons and other powerful firearms. The proposal would move export licenses from the State Department to the Commerce Department. The Department of Commerce estimates that the transfer of authority will increase the number of export applicants by 10,000 annually.

I object to the proliferation of weapons used in war and crime in other countries. Specifically, I oppose the proposal for the following reasons:

1. The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have



substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

2. The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.

3. The Commerce Department does not have resources to enforce export controls, even before the addition of 10,000 firearms export license applicants as a result of this rule predicted by Commerce. The BISs enforcement office, with no staff in Latin America, Africa, or many other parts of the world, is not equipped to take the same level of preventive measures for end-use controls. Moreover, the State Department has developed extensive data, expertise and institutional relations to implement the Leahy Law for security assistance, which can serve as a critical foundation in both pre-license and post-shipment checks to control and verify end uses and end users. Commerce does not have these resources.

4. This rule would transfer gun export licensing to an agency the Commerce Department whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

5. Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries. The export of these weapons should be subject to more controls, not less.

Thank you for considering my objections and concern. I ask that you reject this proposal.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 1:06 PM <b>Received:</b> July 08, 2018 <b>Status:</b> Posted <b>Posted:</b> July 13, 2018 <b>Tracking No.</b> 1k2-945y-30t4 <b>Comments Due:</b> July 09, 2018 <b>Submission Type:</b> Web
--

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0615

Public comment 860. Individual. Patricia Barth. 7-8-18

---

## Submitter Information

**Name:** Patricia Barth

**Address:**

1610 Riverwalk Xing  
Charlottesville, VA, 22911

**Email:** barthpatricia@gmail.com

**Phone:** 3016132189

---

## General Comment

I oppose this rule change that would put export of firearms under Commerce instead of State. Such a change would make our country less safe.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 1:04 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945y-n8er
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0614

Public comment 861. Individual. Michael Ashton. 7-8-18

---

## Submitter Information

**Name:** Michael Ashton

---

## General Comment

Semi-automatic weapons are NOT military weapons! Military units use fully-automatic (aka machine guns).

Don't listen to the morons!

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 1:02 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945z-gv89
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0613

Public comment 862. Individual. Vera Gadman. 7-8-18

---

## Submitter Information

**Name:** vera gadman

---

## General Comment

Ioppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This is an insane idea that Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 1:01 PM <b>Received:</b> July 08, 2018 <b>Status:</b> Posted <b>Posted:</b> July 13, 2018 <b>Tracking No.</b> 1k2-945z-ddyw <b>Comments Due:</b> July 09, 2018 <b>Submission Type:</b> Web
--

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0612

Public comment 863. Individual. Natalie K. 7-8-18

---

## Submitter Information

**Name:** Natalie K

---

## General Comment

I strongly oppose removing control of firearms, guns, ammunition and related articles from control under the United States Munitions list. This removal of control would decrease transparency and hamper the US Congress from automatically learning about and then deciding to block large sales of munitions to other countries or entities for national security purposes or because of human rights violations.

I do not think the Commerce dept has the staff or reach to adequately enforce export controls. This would result in some terrorist organizations and organized crime organizations gaining access to munitions that can be used against us.

Muddying the water only benefits the gun dealers and manufacturers and can only come back to harm US citizens.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 12:53 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945z-yaaq
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0611

Public comment 864. Individual. Pam Magidson. 7-8-18

---

## Submitter Information

**Name:** Pam Magidson

---

## General Comment

Thank you for the opportunity to comment on the Proposed Rule: International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III.

I am a citizen and taxpayer extremely concerned about gun violence and national security, and feel strongly that the handling of export licenses of semiautomatic assault weapons and other powerful firearms should remain with the U.S. State Department rather than move to the U.S. Commerce Department, for the following reasons: This rule would transfer gun export licensing to an agency whose principle mission is to promote trade. Both assault weapons and non-semi-automatic weapons are used in large numbers by criminals around the world. Their export should continue to be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

The proposed rule would transfer the cost of processing licenses from gun manufacturers to us, the taxpayers. Registration fees that are used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So, we the taxpayers will absorb the cost of reviewing applications and processing licenses when it should remain a cost that gun exporters pay.

The rule reduces end-use controls for gun exports in several ways. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would eliminate registration of firearms exporters, which allows the State Department to check on an exporters history. Without use of this database, enforcement against arms trafficking will be seriously weakened. The Commerce Department does not compile information on human rights violations, so this rule would make it harder to deny weapons licenses to international human rights violators

The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries. Furthermore, Congressional oversight for important gun export deals would be eliminated. Congress will no longer be

automatically informed about sizable sales of these weapons. This would violate Congressional intent and effectively eliminate Congress proper role.

Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

What is perhaps scariest is that the proposed rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

Please do not make it easier to export U.S. guns and ammunition globally by moving export licenses of semiautomatic assault weapons and other powerful firearms, given that U.S.-exported firearms are already used in countless crimes, attacks and human rights violations in many nations. This seems to be a rule that would only benefit gun manufacturers, and that is plain wrong.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 12:50 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945z-qalx
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0610

Public comment 865. Individual. Kristopher Anonymous. 7-8-18

---

## Submitter Information

**Name:** Kristopher Anonymous

---

## General Comment

I think this is a terrible idea.

The proposed rule would consider semi-auto assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries. Civilian trade does not need need assault rifles of any sort.

This rule removes Congressional oversight for important gun export deals, reduces transparency and reporting on gun exports (which increases the risk of trafficking along with the removal of of statutory license requirements), shifts the cost of processing licenses from gun manufacturers to taxpayers, gets rid of or decreases many existing gun control efforts, encourages 3D printing of firearms, and transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

It seems practically designed to make gun trafficking more likely, harder to control, and more of a problem than it already is without expanding the resources for any agency to combat all these clear downsides.



# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 12:48 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945z-qkzg
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0609

Public comment 866. Individual. A.L. Steiner. 7-8-18

---

## Submitter Information

**Name:** A.L. Steiner

---

## General Comment

Treating semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries is unconscionable.

Do NOT:

- eliminate Congressional oversight for important gun export deals;
- transfer the cost of processing licenses from gun manufacturers to taxpayers;
- remove statutory license requirements for brokers, increasing risk of trafficking;
- reduce or eliminate end-use controls, such as State Depts Blue Lantern program, nor eliminate the registration of firearms exporters -- a requirement since the 1940s;
- enable unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms

As you know, the U.S. Commerce Department does not have the resources to enforce export controls, even now, so do NOT reduce transparency and reporting on gun exports. DO NOT transfer gun export licensing from an agency with mission to promote stability, conflict reduction and human rights, to an agency with mission to promote trade, for God's sake!

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 12:46 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945z-kdw0
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0608

Public comment 867. Individual. Alex Skolny. 7-8-18

---

## Submitter Information

**Name:** Alex Skolny

---

## General Comment

We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 12:44 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-945z-w2nh
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0607

Public comment 868. Individual. Nicholas Holt. 7-13-18

---

## Submitter Information

**Name:** Nicholas Holt

**Address:**

7710 Winterset Dr.

Charlotte, 28270

**Email:** [npholt@protonmail.com](mailto:npholt@protonmail.com)

**Phone:** 7047788949

**Fax:** 28270

---

## General Comment

Please do not allow the distribution of instructions for 3D printing of firearms. This will benefit only criminals and other dangerous individuals and has no beneficial purpose. Thank you.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 12:43 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-9460-9vd6
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0606

Public comment 869. Individual. Dede Goddard. 7-8-18

---

## Submitter Information

**Name:** Dede Goddard

---

## General Comment

Enough with the plethora of guns in this country...and now the NRA wants to take it worldwide. Just check the facts, we have more deaths due to gun violence than any other country. Studies have shown that the only reason for the huge number of deaths due to gun violence in the U.S. as compared with other countries, is simply the number of guns, period. Do the right thing and stop being influenced by the NRA's money!

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 12:42 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-9460-5bbf
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0605

Public comment 870. Individual. John Richardson. 7-8-18

---

## Submitter Information

**Name:** John Richardson

**Address:**

11 Sunview Circle  
Arden, NC, 28704-9326

**Email:** jpr9@earthlink.net

**Phone:** 8287683520

**Fax:** 28704-9326

---

## General Comment

I support the proposed rule promulgated under BIS-2017-0004. Sporting arms, ammunition, and parts are not "weapons of war" and should not be controlled under ITAR. Moreover, removing these items from the control of the State Department will remove the requirement that some gunsmiths get licensed under ITAR at an extraordinary cost for doing minor gunsmith modifications such as merely threading a barrel.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 12:40 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-9461-dbqt
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0604

Public comment 871. Individual. Mary A Leon. 7-8-18

---

## Submitter Information

**Name:** Mary A Leon

**Address:**

5 Loop Street

San Antonio, TX, 78212-4231

**Email:** leon3@twc.com

**Phone:** 2102815787

---

## General Comment

We the People deserve to be safe and secure in our homes, places of businesses and wherever we and our family are.

The LAST thing we need is to see automatic weapons be allowed to be sold to ANY American, no matter if they are mentally ill, abusive or have been incarcerated for crimes.

The beginning of the onslaught of weapons that can kill many people will end our safety and our RIGHTS as US Citizens!

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 12:39 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-9461-nah1
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0603

Public comment 872. Individual. Ann Armstrong. 7-8-18

---

## Submitter Information

**Name:** Ann Armstrong

---

## General Comment

Comments Re: Proposal for the United States to move oversight of export licenses for semi-automatic assault weapons, sniper rifles, and other powerful firearms from the State Department to the Commerce Department

I am a female senior citizen who, over a span of 76 years, has seen the sale and use of fire arms, especially assault-style weapons designed for military use, proliferate and the loss of life due to gun violence increase to a sickening and almost unimaginable level.

I vehemently oppose the proposal to move oversight of such weapons semi-automatic assault weapons, sniper rifles, and other powerful firearms not meant for use in hunting or other gun-related recreational sport, nor ever meant for self-defense from the State Department to the Commerce Department. Such weapons of war rightfully and logically belong under the purview of a military-oriented department. Further, removal of such weapons from the domain of the State Department is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms. If this proposal is allowed to be enacted, Congress will no longer be automatically informed about sizable sales of these weapons, weakening controls on who ends up with such weapons even lifting restrictions on 3D printing of guns and inevitably leading to people making their own how powered weapons.

This proposal is really a sop to the gun industry and the NRA, aiding them in opening international markets and exporting U.S. guns and ammunition globally without regulation, and will likely lead to more U.S. guns ending up in the hands of criminal organizations, human rights abusers, and terrorist groups. It is a cynical move that wholly ignores the needs and rights of American citizens to live free of the fear of gun violence. It will take the country backward in the fight to reduce gun violence rather than move us forward in our efforts to promote and secure the safety of our citizens.

Further, the new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. The gun exporters that benefit from these sales should bear this cost. National laws for brokers and financiers who arrange firearm shipments are a weak link in curtailing trafficking of small arms and light weapons. Firearms brokers would no longer be subject to US brokering laws which would make it easier for unscrupulous dealers to escape attention. The rule reduces end-use controls and public reporting on gun exports and human rights violations.

The transfer of licensing to Commerce will remove new exporters and brokers from the State Department database, weakening enforcement against arms trafficking. The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The Commerce Department does not have resources, data, expertise or institutional relations to enforce export controls.

The proposed change will also reduce transparency and reporting on gun exports. It would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries. This rule would transfer gun export licensing to an agency the Commerce Department - whose principle mission is to promote trade.

Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights. Military assault style firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. The export of these weapons should NOT be subject to weaker controls.

It is high time we stop kowtowing to the NRA and the gun lobby and start protecting our citizens rights to live free of fear of gun violence. I urge you in the strongest possible way to reject this proposal.

Ann H. Armstrong  
Forest Park, Illinois 60130



# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 12:37 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-9461-5ma5
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0602

Public comment 873. Individual. David Lyman. 7-8-18

---

## Submitter Information

**Name:** David Lyman

---

## General Comment

I am seriously concerned that any transfer of authority from the Department of State to the Commerce Department regarding the sale and shipping of any kind of firearms will bring a world of trouble to our country and to the rest of the world as well. The State Department has the resources and oversight to keep lethal weapons out of the hands of terrorists where the Commerce Department is all about supporting U S business without a keen focus on where the guns will go and what will they be used for. Our world is already awash in guns of all types and we don't need less oversight - we need much more. I would demand that the State Dept. should be given further powers to monitor overseas firearm sales. Commerce should be concerned with non lethal products and commodities and supporting our businesses who trade in products other than firearms. NO to the transfer of authority from State to Commerce regarding fire arms sales.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 12:35 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-9462-ridy
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0601

Public comment 874. Individual. Lisa Fitz. 7-8-187

---

## Submitter Information

**Name:** Lisa Fitz

---

## General Comment

I strongly oppose transfer of regulation of firearms sales abroad from the State Dept. (diplomacy) to the Dept. of Commerce (business). Selling arms to foreign countries or groups is a potential threat to USA safety. We do not need to have the Dept. of Commerce encouraging sales of firearms to foreign hostile governments or groups.

In these times, we must love God above all else and love our neighbors as ourselves. Love is the answer. Not greed, not hate, not fear.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 12:31 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-9462-csju
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0600

Public comment 875. Individual. Christopher Lish. 7-8-18

---

## Submitter Information

**Name:** Christopher Lish

---

## General Comment

Sunday, July 8, 2018

Regulatory Policy Division  
Bureau of Industry and Security  
U.S. Department of Commerce  
Room 2099B  
14th Street and Pennsylvania Avenue NW  
Washington, DC 20230

Subject: Do not switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department -- Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML) (Docket ID: BIS-2017-0004-0001)

To: Secretary of Commerce Wilbur Ross, Under Secretary of Commerce for Industry and Security Eric L. Hirschhorn, and Assistant Secretary for Export Administration Richard E. Ashooh,

I strongly oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

As you are aware, firearms exports are currently classified as "military and are under the jurisdiction of the State Department. Congress can also block sales of large batches of firearms to foreign countries. With this rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines, Saudi Arabia, and Turkey.

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have sufficient staff, let alone staff in every nation around the world. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The rule change would also make the world a far more dangerous place because:

- 1) It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- 2) It would remove licensing requirements for brokers, increasing the risk of trafficking.
- 3) It would remove the State Departments block on the 3-D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3-D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3-D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3-D printing of firearms in the U.S. and around the globe.

I strongly urge you to reject this proposed rule change.

Thank you for your consideration of my comments. Please do NOT add my name to your mailing list. I will learn about future developments on this issue from other sources.

Sincerely,  
Christopher Lish  
San Rafael, CA

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 12:29 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-9462-6tfp
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0599

Public comment 876. Individual. Laura Klauke. 7-8-18

---

## Submitter Information

**Name:** Laura Klauke

**Address:**

1203 Keith Drive  
Cary, NC, 27511

**Email:** ldklauke@gmail.com

---

## General Comment

I am opposed to this proposed rule change. Instead, the Administration should consider other alternatives to better balance the important interests at stake.

Specifically:

I am opposed to the elimination of the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

I am opposed to the removal of licensing requirements for brokers because it will increase the risk of trafficking.

I am opposed to the removal of the State Departments block on the 3D printing of firearms. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 12:27 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-9462-7104
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0598

Public comment 877. Individual. Erin Anonymous. 7-8-187

---

## Submitter Information

**Name:** Erin Anonymous

---

## General Comment

I live in Oregon and not only care about the safety of people near gun bearers in this state but in the other states and Commonwealths of America, and it's allies around the world. I'm very concerned with human rights and how unstable governments have been successful in procuring weapons from sources, possibly the US, and determined at some point in time to use them to harm dissenting civilians, unliked minority groups or portions of their country's population, or even destitute refugees from neighboring unstable countries. Congress, because it is the only power the people have besides a basic vote, should be able to review the movement or sale of weapons to countries outside the US. Congress should have the power of oversight on these arms because they are able to represent us and our requests to our elected officials and some shipments may need to be rejected for society's sake.

The proposed rule treats semi-automatic assault rifles as non-military" which is a terrible decree given the years and decades of work people have given to make this society safer and more supportive of human survival and fulfillment. This proposed rule would allow guns to go places completely circumventing our desire for moral standards of living and safety we have wanted for our own society and in addition, for other societies as well. These are military weapons and should be labeled as such because we should be a country that cares other countries don't have the opportunity to harm themselves as they learn to build societies supportive of human life and fulfillment necessary for each human's health, we should care they don't get the atom bomb, the weapons that wreak chaos, and the approval of us to do it.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 12:25 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-9462-wzyq
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0597

Public comment 878. Individual. Candice Stewart. 7-9-18

---

## Submitter Information

**Name:** Candice Stewart

**Address:**

Noxon, MT, 59853

---

## General Comment

to whom it may concern,

The United States needs to check for pre-licensing and Post Shipment Inspections need to be conducted, No firearms should be exported without being documented. In turn, keeping down the gun trafficking.

To add flame to the fire is the 3D print clause, this clause SHOULD BE eliminated, how would we control gun sales if it is not?  
Strike the 3D clause.

Please, stay informed of Weapons leaving the United States, who knows who's hands they will wind up in. There are too many serious concerns about Human Rights and wildlife safety to consider, do not be hasty in your decision.  
Thank You.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 11:23 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-9464-v63q
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0586

Public comment 879. Anonymous. 7-9-18

---

## Submitter Information

**Name:** Anonymous Anonymous

---

## General Comment

I strongly oppose moving this export license oversight for firearms from the Department of State to the Department of Commerce. How could this proposed rule intend to classify semiautomatic assault rifles as non-military? The reduction of transparency and reporting on gun exports is haunting, knowing how much of our manufactured weapons have been sold to international armies and police forces known for their human right violations.

This proposed rule intends to prioritize the commercial expansion of the gun manufacturing market over the lives it has the potential to massacre. These weapons need to be accounted for and eliminating transparency would be an antithesis to public safety within and outside of the United States.

As a citizen of this country, I strongly oppose diversifying the commercial portfolio of what US gun manufacturers and gun shop owners can solicit because it threatens other countries with the flooding of semiautomatic assault rifles and other weapons that would be declassified.

Thank you for considering my voice.



# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 12:23 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-9462-uwh3
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0596

Public comment 880. Individual. Johanna McConnell. 7-8-18

---

## Submitter Information

**Name:** Johanna McConnell

**Address:**

4398 E. Entrada  
Beavercreek, OH, 45431

**Email:** Jyoungmcconnell@gmail.com

**Phone:** 9374267394

---

## General Comment

It is immoral to sell US made guns abroad. Those guns will be purchased by criminal gangs and used against law enforcement and US soldiers. The only reason Trump is promoting this idea is to gain support from NRA so they will donate to future campaigns.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 12:08 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-9462-imds
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0595

Public comment 881. Individual. Meggin Lane. 7-8-18

---

## Submitter Information

**Name:** Meggin Lane

---

## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake. I would like our legacy, as the United States of America, to be that we made the world a safer place to live rather than create an increase in the level of violence in which the world is already dealing.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 12:06 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-9462-ow5v
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0594

Public comment 882. Individual. Anonymous. 7-8-18

---

## Submitter Information

**Name:** Anonymous Anonymous

---

## General Comment

I oppose changing the oversight of exportation of guns such as the AR-15 and other weapons from State Department to Commerce.

A major reasons for the massive rate of emigration from many countries to the US and Europe is warfare due to civil war or war with the drug cartels. Had America & Russia not exported so many guns many of these people might be living in more peaceful countries. Unfortunately we have already sent enough guns. Giving the Commerce Department free reign to increase guns sales does not make the world a safe place. Gun manufacturers and exporters are responsible for the dangerous world we live in.

I would be in favor of greater restriction on the export of guns. Also greater taxation of gun manufacturing is logical to pay for the damage they have created.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 12:04 PM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-9462-wowz
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0593

Public comment 883. Individual. Lynn Gravelle. 7-8-18

---

## Submitter Information

**Name:** Lynn Gravelle

---

## General Comment

I oppose the rules change that would move the handling of export licenses of powerful firearms from the U.S. State Department to the U.S. Commerce Department. The Commerce Department does not have the experience and resources to adequately enforce export control. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 11:57 AM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-9463-xy3t
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0592

Public comment 884. Individual. Susan Olinger. 7-8-18

---

## Submitter Information

**Name:** Susan Olinger

**Address:**

11312 Woodbrook Lane

Reston, VA, 20194

**Email:** s.olinger1918@gmail.com

**Phone:** 7039048226

**Fax:** 20194

---

## General Comment

I am writing to express my vehement opposition to moving export license oversight for firearms from the U.S. Department of State to the U.S. Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is clearly inconsistent with the undeniable reality that our troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries.

Our government should not be making it easier to trade/export weapons that are likely to be used in other countries by organized crime, terrorism, human rights violations, and political violence. It is inappropriate and shameful that the proposal would, in effect, use the Commerce Department to promote trade in such weapons to kill human beings abroad. Abroad, our country already has the reputation as being overrun with guns; so our solution is to make it easier to export these weapons? The current gun export licensing oversight under the State Department is appropriate as that agency's mission is promoting stability, conflict reduction, and human rights.

In addition to reducing transparency and reporting on gun exports, the proposed rule also would: eliminate Congressional oversight for important gun export deals; transfer the cost of processing licenses from gun manufacturers to taxpayers; and, enable unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

Shameful.



# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 11:55 AM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-9463-cd4z
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0591

Public comment 885. Individual. Sharon Conway. 7-8-18

---

## Submitter Information

**Name:** sharon conway

---

## General Comment

I strongly oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. I think it is foolish to move away from safeguarding our nation to promoting the business of MORE gun sales.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 11:53 AM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-9463-ewnh
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0590

Public comment 886. Anonymous. 7-8-18

---

## Submitter Information

**Name:** Anonymous Anonymous

---

## General Comment

It should be illegal to import firearms from another country and it should be illegal to export firearms from another country.



# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 11:51 AM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-9463-3mf9
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0589

Public comment 887. Individual. Enid Cardinal. 7-9-18

---

## Submitter Information

**Name:** Enid Cardinal

**Address:**

8250 Dunham Road  
Baldwinsville, 13027

**Email:** enid0411@yahoo.com

**Phone:** 3156350097

**Fax:** 13027

---

## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

1 It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

2 It would remove licensing requirements for brokers, increasing the risk of trafficking.

3 It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully

charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Please take all this into consideration before you would take the extremely dangerous step.

Thank you.

Enid Cardinal

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 11:33 AM
<b>Received:</b> July 08, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-9463-2k5w
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0588

Public comment 888. Individual. Janet Moore. 7-9-18

---

## Submitter Information

**Name:** Janet Moore

---

## General Comment

We should be adding controls on weapons and ammunition, and accessories that increase the firepower of weapons. The increase in rampant killing of innocent people should be a glaring warning that our lawmakers are failing the people of the United States, especially failing our children! Stop being swayed by greedy manufacturers and pro-violence gun lobbies.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 11:30 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-9464-ea2j
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0587

Public comment 889. Individual. Paul Cardinet. 7-9-18

---

## Submitter Information

**Name:** Paul Cardinet

---

## General Comment

Do not make it easier to sell, ship or export any type of firearm, or ammunition.

This is not the type of business this country needs to be engaged in.

These weapons only make the world a worse place to live in, and frequently these weapons end up being used against US citizens.

Make the regulations stronger to help bring about a more peaceful world

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 11:21 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-9464-r37n
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0585

Public comment 890. Individual. D Foster. 7-9-18

---

## Submitter Information

**Name:** D Foster

---

## General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Semiautomatic assault weapons and other powerful firearms are clearly military and as such must continue to be under the regulation of the State Department and to allow Congress the ability to block sales of large batches of firearms to foreign countries in the name of national security, and to countries where there are serious human rights concerns. The Commerce Department just does not have the resources to adequately enforce export controls; firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. The rule change would remove the State Departments block on the 3D printing of firearms, effectively enabling 3D printing of firearms in the U.S. and around the globe, which is a terrible idea. This rule change would make both the US and the world a far more dangerous place.

Thank you.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 11:02 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-9465-r5y5
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0584

Public comment 891. Anonymous. 7-9-18

---

## Submitter Information

**Name:** Anonymous Anonymous

---

## General Comment

This proposal would inevitably lead to many more deaths, suffering and subjugation of innocent citizens. Please do not endorse this proposal.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 11:00 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-9465-ojk3
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0583

Public comment 892. Individual. Patti Gorman. 7-9-18

---

## Submitter Information

**Name:** Patti Gorman

---

## General Comment

I oppose the regulation that would put firearms under the control of the Department of Commerce instead of the Department of Defense. The ramifications are dangerous and serious.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 10:58 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-9468-33oq
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0582

Public comment 893. Individual. Andrew Walcher. 7-9-18

---

## Submitter Information

**Name:** Andrew Walcher

**Address:**

12735 Via Esperia  
Del Mar, CA, 92014

**Email:** dre\_walsh@yahoo.com

**Phone:** 7737328326

---

## General Comment

I am writing to oppose the rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department. Firearms are weapons of war and tight restrictions should be maintained on which foreign entities can have access to these.

The current rules automatically informing Congress about sizable weapons sales is critical to keep military-grade hardware from falling into the hands of regimes which pose serious human rights concerns towards their people, or those which would pass these weapons along to terrorist organizations.

The Commerce Department does not have the resources to adequately enforce export controls as its Bureau of Industry and Security does not have staff everywhere. This means we will be relying on the same industry self-regulation which has produced the disastrous US domestic firearms policy. In short, profit will be placed over national security.

The only reason the gun industry wants to eliminate the Blue Lantern program and have Commerce oversee exports is because it will enable them to further flout the rules in place. We cannot allow them to do this.



# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 10:54 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-9468-5icz
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0581

Public comment 894. Individual. Thom F. 7-9-18

---

## Submitter Information

**Name:** Thom F.

---

## General Comment

The State Department must retain control over firearms exports. Gun manufacturers would sell weapons to just about anyone - including terrorists - if not restrained by some meaningful controls. The Commerce Department is an inappropriate venue for such controls.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 10:43 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946b-rk5c
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0580

Public comment 895. Individual. Rich Kunkel. 7-9-18

---

## Submitter Information

**Name:** rich kunkel

**Address:**

wadsworth, OH, 44281

**Email:** sgtrichusmfc@gmail.com

**Phone:** 3303345370

---

## General Comment

I am against this regulation, it has no sense and no commonality. People do NOT want easier access to more guns! This is poorly drafted, and thought out by someone who works for the NRA, NOT the American people. Against this!!!

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 10:41 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946b-3hm2
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0579

Public comment 896. Individual. Janice Valder. 7-9-18

---

## Submitter Information

**Name:** Janice Valder

---

## General Comment

I am opposed to this. You are taxing me to allow semi-automatic weapons to be sent with little or less regulation two countries that already have the highest crime rate and Americans are often warned to not travel there. I asked you as a Department of Commerce to look carefully at what and why you are a part of our federal government and then vote this policy down.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 10:40 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946c-hf86
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant  
Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant  
Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0578

Public comment 897. Individual. Gordon Scott. 7-9-18

---

## Submitter Information

**Name:** gordon scott

**Address:**

1516 s fairfield dr

pensacola, 32507

**Email:** gordonscott269@yahoo.com

**Phone:** 8505258208

**Fax:** 32507

---

## General Comment

keep the agency that regulates gun sales as it is now as this will protect our nation

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 10:37 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946c-jse1
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0577

Public comment 898. Individual. Roselie Bright. 7-9-18

---

## Submitter Information

**Name:** Roselie Bright

---

## General Comment

Because my faith calls on me to protect all people I oppose moving gun export licensing from the State Department to the Commerce Department. The State Department is better equipped to keep guns out of the hands of terrorists that want to harm people, including Americans.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 10:35 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946d-z19p
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0576

Public comment 899. Individual. Tucker Respass. 7-9-18

---

## Submitter Information

**Name:** Tucker Respass

---

## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department vigorously oppose the rule changes that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Such trade must be factored into international interactions and diplomacy. It is not simply a matter of commerce. Further, the proposals to cease licensing would make arms too easily trafficked, especially without at least as much inspection as has been conducted with State Department oversight. And there should never be 3D reproduction of guns of any size of fire-power.

Tucker Respass

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 9:49 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946d-wg3f
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0551

Public comment 900. Anonymous. 7-9-18

---

## Submitter Information

**Name:** Anonymous Anonymous

---

## General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 9:47 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946d-wuvb
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0549

Public comment 901. Individual. Edward Schortman. 7-9-18

---

## Submitter Information

**Name:** Edward Schortman

**Address:**

401 East Woodside Drive  
PO Box 291  
Gambier, OH, 43022

**Email:** schortma@kenyon.edu

**Phone:** 7404272484

**Fax:** 43022

---

## General Comment

I am deeply concerned by the proposed shift from the State Department to the Department of Commerce in the handling of export licenses for semi-automatic assault weapons. This appears to be a blatant effort to promote the sale of these instruments of death abroad, thereby compensating gun manufacturers for the loss of sales at home. This naked advancement of the interests of the gun lobby will only result in more guns in the hands of more people some of whom will certainly use these weapons against our troops and civilians. Haven't we bowed down deeply enough to the gun lobby already? How many more people at home and abroad have to die in order to enrich a few gun manufacturers? Please keep the granting of export licenses for semi-automatic weapons in the hands of the State Department whose primary job is to protect all of us, not just a few gun manufacturers.



# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 9:45 AM <b>Received:</b> July 09, 2018 <b>Status:</b> Posted <b>Posted:</b> July 13, 2018 <b>Tracking No.</b> 1k2-946d-s0uo <b>Comments Due:</b> July 09, 2018 <b>Submission Type:</b> Web
--

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0547

Public comment 902. Individual. Stephen Johnson. 7-9-18

---

## Submitter Information

**Name:** Stephen Johnson

**Address:**

San Diego, CA, 92117

**Email:** sejn@att.net

**Phone:** 8585410528

---

## General Comment

Please stop these sales of weapons.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 9:44 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946d-kd88
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0544

Public comment 903. Individual. Pamela Albers. 7-9-18

---

## Submitter Information

**Name:** Pamela Albers

---

## General Comment

I am a 60 year old American citizen who is sickened by the unnecessary violence perpetuated by the availability of weapons.

I am opposed to the proposed rule change for the following reasons:

The proposed rule change treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less.

The proposed rules are bad policy and encourage bad conduct.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 9:42 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946e-y5i9
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0542

Public comment 904. Individual. Karyn Barry. 7-9-18

---

## Submitter Information

**Name:** karyn barry

**Address:**

Waltham, MA, 02451

**Email:** karynbarry@yahoo.com

**Phone:** 7818946000

---

## General Comment

The U.S. should not be in the business of exporting guns and weapons. This is totally shameful and immoral.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 9:37 AM <b>Received:</b> July 09, 2018 <b>Status:</b> Posted <b>Posted:</b> July 13, 2018 <b>Tracking No.</b> 1k2-946e-dqvp <b>Comments Due:</b> July 09, 2018 <b>Submission Type:</b> Web
--

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0536

Public comment 905. Individual. Jennifer Messina. 7-9-18

---

## Submitter Information

**Name:** Jennifer Messina

---

## General Comment

Oh my, money, money, money. For some it is all there is. NRA and their compulsive greed. This idea sounds like it could come back and bite us in the rear. Young American military personel facing arms sold by the NRA. I say leave it the way it is.. Our present president is a nut job please don't follow his determinations.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 9:35 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946e-suoo
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0533

Public comment 906. Individual. Dinmani Savla. 7-9-18

---

## Submitter Information

**Name:** dinmani savla

**Address:** United States,

**Email:** dsa\_94040@yahoo.com

---

## General Comment

I oppose the rule change that would switch regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This change will jeopardize the safety of us, constituents. It is so shameful that this administration is more interested in its colluded interests than country's and its residents' security.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 9:33 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946e-yv03
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0531

Public comment 907. Individual. William Walls. 7-9-18

---

## Submitter Information

**Name:** William Walls

**Address:**

6430 22nd St N  
Arlington, 22205

**Email:** WallsWJ@hotmail.com

**Phone:** 7035333276

**Fax:** 22205

---

## General Comment

To whom it may concern:

This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. Switching the regulation of firearms exports to Commerce would facilitate firearms exports to oppressive regimes, remove safeguards that help keep organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and exacerbates the worldwide refugee crisis.

William J. Walls

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 9:32 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946e-dnw1
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0529

Public comment 908. Individual. Amy Veltman. 7-9-18

---

## Submitter Information

**Name:** Amy Veltman

---

## General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Firearms trade should clearly be regulated by an organization responsible for our national security above profit. We don't want our arms getting in the hands of bad actors.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 9:30 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946f-oy96
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0528

Public comment 909. Individual. Amber Eby. 7-9-18

---

## Submitter Information

**Name:** Amber Eby

---

## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Thank you for doing the right thing to keep us safe.



# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 9:29 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946f-lp90
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0527

Public comment 910. Individual. Nancy Barrineau. 7-9-18

---

## Submitter Information

**Name:** Nancy Barrineau

**Address:**

901 W Church St  
Laurinburg, NC, 28352

**Email:** nwbarrineau@gmail.com

**Phone:** 9103181178

**Fax:** 28352

---

## General Comment

The proposed gun rule change would benefit the NRA while making the world a far more dangerous place for the rest of us.

By eliminating the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them; removing licensing requirements for brokers, increasing the risk of trafficking; and removing the State Departments block on the 3D printing of firearms.

Please protect us. Protect the rest of the world, too. Thank you. I vote!

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 9:27 AM <b>Received:</b> July 09, 2018 <b>Status:</b> Posted <b>Posted:</b> July 13, 2018 <b>Tracking No.</b> 1k2-946f-dquj <b>Comments Due:</b> July 09, 2018 <b>Submission Type:</b> Web
--

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0526

Public comment 911. Individual. Noella Poinsette. 7-9-18

---

## Submitter Information

**Name:** Noella Poinsette

**Address:**

291 Hayes St. #8,  
Holland, 49424

**Email:** npoinsette@yahoo.com

**Phone:** 6164035265

**Fax:** 49424

---

## General Comment

We should not be exporting more guns especially guns of the same type that our military uses and the licensing should not be transferred to an agency the Commerce Department that already cannot fulfill its responsibilities. Licensing needs to stay with the State Department which is more focused on the harm that these weapons do to our citizens abroad and citizens of other countries.

A 2nd reason I am strongly opposed to these proposed changes is that congressional oversight would effectively be eliminated. This is extremely important because without such oversight nobody would have been aware of the scope of recent human rights violations in the Philippines or in Turkey.

We as a country need to continue to stand up for the dignity of each person - a dignity that is far more important than a few people or companies making money off of an increase in violence and killing.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 9:26 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946f-g9es
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0524

Public comment 912. Individual. Laurel Cameron. 7-9-18

---

## Submitter Information

**Name:** Laurel Cameron

---

## General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This would change the focus on protecting our nation and promoting firearm safety to promoting the sale of guns throughout the world. We have such an epidemic of gun violence due to the easy access of powerful weapons, this is not a problem we should be exporting to the rest of the world. Making this change has serious negative ramifications for our nation's safety, with little chance of ever repairing the harm. We cannot allow profit to be the prime driver when it comes to weaponry.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 9:24 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946f-jms9
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0523

Public comment 913. Individual. Mark Schneegurt. 7-9-18

---

## Submitter Information

**Name:** Mark Schneegurt

---

## General Comment

I am a registered Republican from Kansas and I always vote. I stand with the students from Parkland and want to limit gun violence with common sense laws and regulations. Let's not follow the bad practices of Ollie North (the criminal) head of NRA.

I oppose the proposed rule for the following reasons:

The proposed rule treats semi-automatic assault rifles as non-military.

The proposed rule would eliminate Congressional oversight for important gun export deals.

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers.

National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons.

The rule reduces end-use controls for gun exports.

The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have resources to enforce export controls, even before the addition of 10,000 firearms export license applicants as a result of this rule predicted by Commerce.

The proposed change will reduce transparency and reporting on gun exports.

This rule would transfer gun export licensing to an agency the Commerce Department whose principle mission is to promote trade.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 9:20 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946g-4ln1
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0522

Public comment 914. Individual. Hollye Dexter. 7-9-18

---

## Submitter Information

**Name:** Hollye Dexter

---

## General Comment

My name is Hollye Dexter. I am on the board of directors for Women Against Gun Violence and have experienced the scourge of gun violence in my own family. I vehemently oppose the transfer of oversight of firearms export from the state to commerce department. Guns kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. The types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries. This will only send more asylum seekers fleeing to our borders. And then what? We lock them up and take their children? This is a terrible and dangerous proposal only created to put money in the gun lobby's pockets.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 9:18 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946g-iz4j
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0521

Public comment 915. Individual. Joann Hagen. 7-9-18

---

## Submitter Information

**Name:** Joann Hagen

**Address:**

402 E Main St  
Decorah, IA, 52101

---

## General Comment

We are very much opposed to weakening the requirements for military gun sales overseas. We do not agree with the NRA that everyone in the USA and world needs an assault weapon. We oppose the movement from the state dept and will lobby against it.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 9:17 AM <b>Received:</b> July 09, 2018 <b>Status:</b> Posted <b>Posted:</b> July 13, 2018 <b>Tracking No.</b> 1k2-946g-1lhp <b>Comments Due:</b> July 09, 2018 <b>Submission Type:</b> Web
--

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0520

Public comment 916. Individual. Ruth Lombard. 7-9-18

---

## Submitter Information

**Name:** Ruth Lombard

**Address:**

Sonoma, CA, 95476

**Email:** hunbard@gmail.com

**Phone:** 707 996-7457

---

## General Comment

Moving handling of export licenses of semiautomatic assault weapons and other firearms from the U.S. State Department to the U.S. Commerce Department. Gun violence is a problem around the world, and certainly within the United States. There is no way to guarantee how semiautomatic weapons would be used in other countries. Turning export licenses over to an agency that promotes U.S. products, rather than considering the use of the product would be a detriment to U.S. and world citizens.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 9:15 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946g-8m24
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0519

Public comment 917. Individual. William Marsh. 7-9-18

---

## Submitter Information

**Name:** William Marsh

**Address:**

3549 Lowell Street  
San Diego, CA, 92106

**Email:** wmarsh@cox.net

**Phone:** 619-694-9529

---

## General Comment

I am opposed to the transfer of oversight of firearms exports from the State Department to the Commerce Department. Firearms are weapons of war. The State Department is tasked with relations with other countries and the reduction of violent conflict in the world. The State Department is in a position to know the political ramifications of shipping weapons of war to any particular country, and therefore should be in charge regulating the sale of such weapons of war. The sale of such weapons should remain under control of the USML.



# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 9:13 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946g-fktm
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0518

Public comment 918. Individual. Kate Kizer. 7-9-18

---

## Submitter Information

**Name:** Kate Kizer

---

## General Comment

I'm an expert on civilian harm and the arms trade, and I write to urge you to reject this dangerous proposal because:

1. The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, and US troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate arms exports.
2. The proposed rule would eliminate Congressional oversight for gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons, which will limit its ability to comment on related human rights concerns. Items moved to Commerce control would no longer be subject to the statutory required congressional notification for sales of firearms regulated by the US Munitions List valued at \$1 million or more. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress proper role.
3. The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing, leaving the government i.e. taxpayers to absorb the cost of reviewing applications and processing licenses.
4. National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts

to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention.

5. The rule reduces end-use controls for gun exports. It would eliminate the States Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. End-use controls also are weakened by eliminating registration of firearms exporters. Registration of exporters allows State to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. Transferring licensing to Commerce will remove new exporters and brokers of these firearms from State's database, weakening enforcement.

6. The rule enables unchecked gun production in the US and exports abroad by removing the block on 3D printing of firearms. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms in the US and around the globe. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could generate many preventable tragedies.

7. The Commerce Department does not have resources to enforce export controls, even before the addition of 10,000 firearms export license applicants as a result of this rule predicted by Commerce. The BISs enforcement office, with no staff in other parts of the world, is not equipped to take the same level of preventive measures for end-use controls. Moreover, State has developed extensive data, expertise and institutional relations to implement the Leahy Law for security assistance the Commerce does not.

8. The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.

9. This rule would transfer gun export licensing to an agency the Commerce Department whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by State, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

The export of these weapons should be subject to more controls, not less.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 9:08 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946h-rws3
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0517

Public comment 919. Individual. Rebecca Gould. 7-9-18

---

## Submitter Information

**Name:** Rebecca Gould

---

## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It poses grave concerns for our national security and the security of people around the world.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 9:07 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946h-kx6w
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0516

Public comment 920. Individual. Christy Milam. 7-9-18

---

## Submitter Information

**Name:** Christy Milam

---

## General Comment

I oppose the the Trump administration proposal to move the make it easier to export U.S. guns and ammunition globally. By transferring the authority from the State Department to the Commerce Department, the number of exports applicant will increase by 10,000 annually. This includes assault weapons and other powerful firearms! This change in policy is problematic because it:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 9:05 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946h-dan7
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0515

Public comment 921. Individual. Al Lindsey. 7-9-18

---

## Submitter Information

**Name:** Al Lindsey, M.D.

**Address:**

4711 Lookout Mountain Cove

Austin, TX, 78731

**Email:** alind88@gmail.com

**Phone:** 5129231687

---

## General Comment

The supervision of Firearms and Related Articles should NOT be transferred to The Dept. of Commerce. The rules in place under The State Dept. should be maintained so that FEWER, not more, assault-type weapons and armor-piercing bullets are exported to other countries. These war weapons and cop-killer bullets are too dangerous to be in ANYONE'S hands who is not military or in law enforcement, IMHO as a Vietnam Veteran and life-long hunter and gun owner.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 9:04 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946h-xzxy
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0514

Public comment 922. Anonymous. 7-9-18

---

## Submitter Information

**Name:** Anonymous Anonymous

---

## General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports.

The proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so that public may understand the impact of these rules and potential firearm exports. Also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 9:02 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946h-64kq
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0513

Public comment 923. Individual. Nicole Clarke. 7-9-18

---

## Submitter Information

**Name:** Nicole Clarke

---

## General Comment

I oppose the proposed rule, as it loosens the regulation of gun exports and increases the risk that military-style weapons land in the hands of international criminals. The proposed rule dramatically changes the regulatory structure for firearm exports and appears largely driven by the interests of the firearms industry. Notably, the proposed rule decreases transparency to Congress and the public. I urge you to reject the proposed rule as currently drafted.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 9:00 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946h-iic0
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0512

Public comment 924. Anonymous. 7-9-18

---

## Submitter Information

**Name:** Anonymous Anonymous

---

## General Comment

Stop selling guns to every nut who wants one.



# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 8:57 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946h-6jsr
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0511

Public comment 925. Individual. Stephen Lane. 7-9-18

---

## Submitter Information

**Name:** Stephen Lane

**Address:**

Bethesda MD, United States, 20816

**Email:** atticlane@yahoo.com

**Phone:** 5712214120

---

## General Comment

I oppose this, or any other, rule change that would move the regulations of firearms export from the State Department to any other agency. That change would encourage firearms sales to entities that we all agree should not have them, such as oppressive political regimes, criminals and terrorists in other countries. The resulting increase in violence would not only destabilize those countries, but encourage mass migration to the United States, both undesirable outcomes.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 8:55 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946h-drmj
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0510

Public comment 926. Individual. Kathleen Kelcey. 7-9-18

---

## Submitter Information

**Name:** Kathleen Kelcey

---

## General Comment

I am in opposition to this or any rule change that would remove arms sales, gun sales, of any kind from the purview of the US State Department. This rule change is not in the country's best interest.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 8:54 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946h-abow
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0509

Public comment 927. Individual. Kamella Tate. 7-9-18

---

## Submitter Information

**Name:** Kamella Tate

---

## General Comment

I come from many generations of responsible rural gun owners. There are times and places where gun ownership and use are critical; however, I find the proposal to ease restrictions on the exportation of guns and ammunition from the United States to be abhorrent. We struggle enough with gun violence in our own country, that the gun industry and the NRA are pushing to embed that struggle in other communities just to increase sales and profits is poisonous and amounts to nothing more than greed run amuck. Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to MORE controls, not fewer.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 8:53 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946i-i6fr
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0508

Public comment 928. Individual. Sarah Fishback. 7-9-18

---

## Submitter Information

**Name:** Sarah Fishback

---

## General Comment

I am concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. I am also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms.

Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 8:51 AM <b>Received:</b> July 09, 2018 <b>Status:</b> Posted <b>Posted:</b> July 13, 2018 <b>Tracking No.</b> 1k2-946i-iujn <b>Comments Due:</b> July 09, 2018 <b>Submission Type:</b> Web
--

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0507

Public comment 929. Individual. Sherry Blanton. 7-9-18

---

## Submitter Information

**Name:** Sherry Blanton

**Address:**

549 Florida Ave T-3  
Herndon, VA, 20170

**Email:** sherryblanton2@cox.net

**Phone:** 703-447-2365

---

## General Comment

Please do not switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Firearms are not just merchandise made and sold to profit businesses; they are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 8:50 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946i-xtey
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0506

Public comment 930. Individual. Jacqueline Zeller. 7-9-18

---

## Submitter Information

**Name:** Jacqueline Zeller

**Address:** United States,

---

## General Comment

I strongly oppose this change to switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. If the entire premise is that firearms should be used as a means of protection they should be regulated as such, not as a means for profit. Supporting the right to bear arms is separate from promoting the distribution of such to foreign lands. The Commerce Department is not currently setup to appropriately monitor, and control the sale and distribution of munitions. Please do not move forward with this rule change. Thank you.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 8:49 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946i-b4h0
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0505

Public comment 931. Individual. Jay Gregory. 7-9-18

---

## Submitter Information

**Name:** Jay Gregory

**Address:**

11000 Cameron Ave  
Oakland, CA, 94605

**Email:** djaustinggregory@yahoo.com

---

## General Comment

Please do not authorize more sales of guns abroad by America gun companies!

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 8:47 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946i-swmx
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0504

Public comment 932. Anonymous. 7-9-18

---

## Submitter Information

**Name:** Anonymous Anonymous

---

## General Comment

U.S. gun manufacturers -- and their lobbying machine, the NRA -- are pushing for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Dept. to the U.S. Commerce Dept.

The mission of the U.S. State Dept. is to safeguard our country. The mission of the U.S. Commerce Dept. is to promote U.S. businesses.

The handling of export licenses (for powerful firearms) by the U.S. Commerce Dept. would promote more gun violence and unnecessary wars abroad, and it would compromise U.S. national security.

Please keep the U.S. State Dept. in charge of handling of export licenses for powerful firearms.

Thank you for your consideration on this matter.



# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 8:46 AM <b>Received:</b> July 09, 2018 <b>Status:</b> Posted <b>Posted:</b> July 13, 2018 <b>Tracking No.</b> 1k2-946i-1tce <b>Comments Due:</b> July 09, 2018 <b>Submission Type:</b> Web
--

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0503

Public comment 933. Individual. R. Catania. 7-9-18

---

## Submitter Information

**Name:** R. Catania

---

## General Comment

I oppose vehemently this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Please do not change the rule.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 8:44 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946i-wxai
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0502

Public comment 934. Anonymous. 7-9-18

---

## Submitter Information

**Name:** Anonymous Anonymous

---

## General Comment

Please do not go ahead with the proposal to export license oversight for firearms from the Department of State to the Department of Commerce. I object to this rule change because it depends on defining semiautomatic assault rifles as non-military" even though U.S. troops routinely use their military rifles in semiautomatic mode and civilians are not allowed to possess such weapons many countries. I also find this proposal problematic because it reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 8:43 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946i-e9hk
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0501

Public comment 935. Individual. Terry Kosobud. 7-9-18

---

## Submitter Information

**Name:** TERRY KOSOBUD

**Address:**

4612 Steed Drive  
AUSTIN, TX, 78749

**Email:** tpkosobud@gmail.com

**Phone:** 8472243566

**Fax:** 78749

---

## General Comment

I oppose this change in rules. Control of guns should remain within the US Department of State. The US government should not be in the business of trying to promote gun sales abroad. There is enough evidence that easy access to guns results in innocent people being killed.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 8:35 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946i-xkcs
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0500

Public comment 936. Individual. Danielle Machotka. 7-9-18

---

## Submitter Information

**Name:** Danielle Machotka

---

## General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Please do not institute this change.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 8:34 AM <b>Received:</b> July 09, 2018 <b>Status:</b> Posted <b>Posted:</b> July 13, 2018 <b>Tracking No.</b> 1k2-946j-ooco <b>Comments Due:</b> July 09, 2018 <b>Submission Type:</b> Web
--

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0499

Public comment 937. Individual. Rob Gregson. 7-9-18

---

## Submitter Information

**Name:** Rob Gregson

---

## General Comment

I strongly oppose this move away from regulation under the United States Munitions List. I believe both the national and personal security of our allies and neighbors means that gun sales and licensing need to remain firmly in the hands of experienced diplomats and other staff of the US State Dept.

Sincerely,  
Rev. Rob Gregson  
Summit, NJ

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 8:33 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946j-wpy8
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0498

Public comment 938. Individual. Rev. Rob Gregson. 7-9-18

---

## Submitter Information

**Name:** Anonymous Anonymous

---

## General Comment

I am strongly in favor of the control of firearms sales outside the United States to remain under the control of the US Munitions List. It is the purview and expertise of the State Dept. to regulate and manage the sale of weaponry to foreign states, not the US Commerce Dept.

Sincerely,  
Rev. Rob Gregson  
Summit, NJ

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 8:31 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946j-6uhw
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0497

Public comment 939. Individual. Ann L. 7-9-18

---

## Submitter Information

**Name:** Ann L

---

## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

The world doesn't need more firearms. We need to spend our energy, time and money and resources on children, education, healthcare, alternative energy, among many other things. Shipping more guns to other countries will only make our own country less safe.

Also, my dear friend was killed by a gun accidentally almost 20 years ago. He was meticulous about how he handled guns, and was very safe with them. Unfortunately, accidents still happen, and I will never see him again. I don't wish the experience of losing a loved one to a gun on anyone.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 8:27 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946j-7lea
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0496

Public comment 940. Anonymous. 7-9-18

---

## Submitter Information

**Name:** Anonymous Anonymous

---

## General Comment

I strongly OPPOSE the proposed rule.

The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.

This rule would transfer gun export licensing to an agency the Commerce Department whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries. The export of these weapons should be subject to more controls, not less.



# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 8:25 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946j-d3on
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0495

Public comment 941. Individual. Everard Davenport. 7-9-18

---

## Submitter Information

**Name:** Everard Davenport

---

## General Comment

I am deeply troubled by this proposed rule governing article which may be used t kill human beings, primarily because it

- 1) Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
- 2) Eliminates Congressional oversight for important gun export deals.
- 3) Removes statutory license requirements for brokers, increasing risk of trafficking.
- 4) Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.
- 5) The Commerce Department does not have the resources to enforce export controls, even now.
- 6) Reduces transparency and reporting on gun exports.
- 7) Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

One is merely offensive - the cost of licenses should be borne by end users and not transferred to the rest of us.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 8:23 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946j-zwhy
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0494

Public comment 942. Individual. Margaret Peeples. 7-9-18

---

## Submitter Information

**Name:** margaret Peeples

**Address:**

838 Heather lane  
charlotte, NC, 28209

**Email:** peeplesmargaret@gmail.com

**Phone:** 919-789-9056

---

## General Comment

I do not want rules loosened on gun exports which will increase the risk of dangerous weapons being bought or stolen by international criminals. The proposed rule changes do not adequately address our national security, foreign policy, and the need for transparency so Congress and the public can understand the impact of these rules on firearm exports.

The administration should consider other alternatives given the dangerous elements considered in these rules.

The rules changes would remove the licensing requirements for brokers, increasing the high risk of trafficking, and it would remove the State dept. blocking on the 3D printing of firearms. Removing this block enables 3D printing of firearms in the US and around the world.

American citizens want stronger regulations on firearms in the US and in trade. Americans do not want more terrorism In the world. Do not weaken the regulations, strengthen them.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 8:21 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946j-jytn
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0493

Public comment 943. Individual. Hazel Ryon. 7-9-18

---

## Submitter Information

**Name:** Hazel Ryon

---

## General Comment

My name is Hazel Ryon. I oppose the transfer of oversight of firearms export from the state to commerce department. Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries. The export of these weapons should be subject to more controls, not less.

Please let us know if you did this and how long it took. It should take one minute or less.

Thank you!

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 8:19 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946k-85pk
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0492

Public comment 944. Individual. Theodore J. Fetter. 7-9-18

---

## Submitter Information

**Name:** Theodore J. Fetter

**Address:**

187 Darrah Lane  
Lawrenceville, NJ, 08648

**Email:** fetter4@verizon.net

---

## General Comment

There is no question that there is a legitimate need to keep the State Department involved in decisions about the export of firearms. To what countries? In what quantities? The Department of Commerce, of course, might care about those questions, but generally they would be pleased to see a growth in US exports, and they would be far less likely to consider any vital questions to our national security interest.

I am told that there are traffickers in firearms whose business is to move weapons and ammunition from one place to another. They care about profit, not any country's security. I cannot imagine my government giving carte blanche to such movement of weapons and ammunition.

The Commerce Department has little staff and no training in this area. On the other hand, the staff at the State Department are trained to ask the right questions about what a particular export means for US foreign policy and for US relations with other countries.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 8:14 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946k-wywr
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0491

Public comment 945. Individual. Amy Armistead. 7-9-18

---

## Submitter Information

**Name:** Amy Armistead

**Address:**

7206 Hawthorn Avenue  
Los Angeles, CA, 90046

**Email:** amy@nancyangdon.net

---

## General Comment

It defies logic, precedent and proven security safeguards. There is no reason to take away the power of the Department of State to regulate and control the sale and distribution of firearms from the US to other countries. The only interests the transfer of this regulatory obligation to the Department of Commerce would serve is that of gun manufacturers and distributors. This is a brazen power grab that does not serve the American people, their interests or their safety. The idea that any recommendation from this president\* and his corrupt, self dealing cabinet should be considered, let alone adopted, defies logic and makes us more vulnerable than ever by sacrificing public safety for the enrichment of well connected companies and individuals who make their fortunes by pedaling violence and mayhem to already vulnerable and unstable parts of the world. This endangers us all. Do not allow this stupid, corrupt abuse of power to undermine our currently working regulatory framework.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 8:12 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946k-59mj
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0490

Public comment 946. Individual. Alberta Wilkes. 7-9-18

---

## Submitter Information

**Name:** Alberta Wilkes

**Address:**

213 Hanford St.

Columbus, OH, 43206

**Email:** awilkes2@yahoo.com

**Phone:** 614-444-1733

---

## General Comment

I'm a Franciscan Sister volunteering for the past 30 years at my center city parish in Columbus OH. Our neighborhood is no stranger to drive-by shootings and robbery and other crime involving guns. Death and maiming from guns and assault rifles must be contained, and, ideally, stopped here and abroad.

I am opposed to the proposal to make it easier for our country to export firearms and assault weapons to other countries.

My understanding is that under what's proposed Congress would no longer have to review critical export deals, and that certain licensing costs will be borne by taxpayers. This is unthinkable! There is a raft of other measures that would loosen controls that are so needed on lethal weapons. If approved, the measures would result in more deaths in the world community. I believe that the oversight of gun export belongs to the State Department that is concerned with security and our Congress rather than the Commerce Department whose mission is mainly promoting trade.

Respectfully,

Sister Alberta Wilkes, OSF

St. Leo Convent

213 Hanford St.

Columbus OH 43206



# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 8:10 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946k-yaza
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0489

Public comment 947. Individual. Suzanne Nordmann. 7-9-18

---

## Submitter Information

**Name:** Suzanne Nordmann

---

## General Comment

My name is Suzanne and I'm a voter in San Diego, CA. As a victim of gun violence, I oppose the proposed rule for the following reasons:

The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage.

The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons.

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government i.e., taxpayers will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.

National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law.

The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators.

The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.

This rule would transfer gun export licensing to an agency the Commerce Department whose principle mission is



to promote trade.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 8:08 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946k-9m3m
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0488

Public comment 948. Individual. Margaret Hardy. 7-9-18

---

## Submitter Information

**Name:** Margaret Hardy

---

## General Comment

I am an active member of San Diego 4 Gun Violence Prevention and it has come to my attention that the Trump Administration is proposing to transfer licensing and oversight of firearms exports from the State Department to the Department of Commerce. It is my opinion that if this occurs, more firearms will get in the hands of criminal organizations, human rights abusers, and terrorist groups and is being pushed to open up international markets to compensate for lagging domestic gun sales. I am vehemently opposed to this proposed change for these reasons:

- Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
- Eliminates Congressional oversight for important gun export deals.
- Transfers the cost of processing licenses from gun manufacturers to taxpayers.
- Removes statutory license requirements for brokers, increasing risk of trafficking.
- Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.
- Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.
- The Commerce Department does not have the resources to enforce export controls, even now.
- Reduces transparency and reporting on gun exports.
- Transfers gun export licensing from agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.
- Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less.

Please consider not implementing this proposal.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 8:07 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946l-x4ih
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0487

Public comment 949. Individual. Dave Kisor. 7-9-18

---

## Submitter Information

**Name:** Dave Kisor

---

## General Comment

Background checks are necessary. The NRA fights them because people can't just go to a show and buy a gun without a check. It's high time the NRA's charter were challenged. I remember a time when they stood for gun safety, but now it's absolute nuttiness! Then there's the first half of the Second Amendment about the well regulated militia that everybody seems to have forgotten or ignore. Then there are those who want assault weapons, which are no good for defense, which strangely enough the reason for the Second Amendment was to defend the nation against enemies both foreign and domestic. One takes an assault weapon to \_\_\_\_\_, not to \_\_\_\_\_. If you did not guess assault and defend, then you should not have access to anything more dangerous than a soup spoon.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 8:05 AM <b>Received:</b> July 09, 2018 <b>Status:</b> Posted <b>Posted:</b> July 13, 2018 <b>Tracking No.</b> 1k2-946l-r79w <b>Comments Due:</b> July 09, 2018 <b>Submission Type:</b> Web
--

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0486

Public comment 950. CTP Inc. Anonymous. 7-9-18

---

## Submitter Information

**Name:** Anonymous Anonymous

**Organization:** CTP, Inc.

---

## General Comment

BIS has noted in its proposed rule announcement that [t]he EAR does not include a concept of defense services, and the technology related controls are more narrowly focused and apply in limited contexts as compared to the ITAR. Consider that if ECCN 0E501 will control technology for the development, production, operation, installation, maintenance, repair, or overhaul of firearms controlled by new ECCN 0A501, then certain firearms training, which would have previously been an ITAR-controlled defense service, may now be NLR to many destinations.

BIS has also noted, If a gun manufacturer posts a firearms operation and maintenance manual on the Internet, making it publicly available to anyone interested in accessing it and without restrictions on further dissemination (i.e., unlimited distribution), the operation and maintenance information included in that published operation and maintenance manual would no longer be subject to the EAR. Following this logic, consider the fact that if a gun manufacturer posts on the internet for unlimited distribution 0E501 technology for the production of a 0A501 firearm (e.g., 3D printer specs), then it is not an unauthorized technology transfer but rather publicly available information no longer subject to the EAR.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 8:03 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946l-vv2d
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0485

Public comment 951. Individual. Mark Wilson. 7-9-18

---

## Submitter Information

**Name:** Mark Wilson

---

## General Comment

I oppose the rule change that would transfer firearms export regulations from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 8:01 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946l-1zkr
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0484

Public comment 952. Individual. Mary Klonowski. 7-9-18

---

## Submitter Information

**Name:** Mary Klonowski

**Address:** United States,

**Email:** maryklon@comcast.net

---

## General Comment

Please retain the export of firearms within the State Department. Their more rigid oversight will help ensure that U.S. made firearms aren't used against our own servicemen and women.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 8:00 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946l-td0g
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0483

Public comment 953. Individual. CM Schneider. 7-9-18

---

## Submitter Information

**Name:** CM Schneider

---

## General Comment

The Trump administration's changes to gun regulations and its alignment with the NRA and gun manufacturers is disgusting. I oppose the rule change that would switch the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.



# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 7:59 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946m-tpyg
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0482

Public comment 954. Individual. Joann Edmonds-Rodgers. 7-9-18

---

## Submitter Information

**Name:** Joann Edmonds-Rodgers

---

## General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This rule change would have devastating affects on our national security. If this rule change goes into effect we will soon find American guns being regularly used against American soldiers and in terrorist attacks abroad. There are many valid and good reasons the State Department has had control over firearm export regulation. Only they are in the unique position to understand who should and shouldn't be granted these licenses to ensure the safety of our military and the public. Please put our national security and lives above profits of the gun industry by opposing this rule change.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 7:53 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946n-y3ce
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0481

Public comment 955. Individual. William Barclay. 7-9-18

---

## Submitter Information

**Name:** William Barclay

**Address:**

304 Tulane Ave  
Ventura, CA, 93003

---

## General Comment

I oppose the rule change that would switch the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

The proposed rule change would give control of the the export of guns and munitions over to the Dept of Commerce where the desire to increase exports and help US gun and munition manufacturers would over rule the questions of gun safety and the need to reduce, not increase the number of lethal weapons in the world at large. A bad decision.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 7:52 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946n-gb42
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0480

Public comment 956. Individual. Barbara Karplus. 7-9-18

---

## Submitter Information

**Name:** Barbara Karplus

---

## General Comment

Please keep the control of firearms under the jurisdiction of the Department of State. We need to make sure our firerms do not end up in the hands of those who wish us harm. That is the purview of the State Department.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 7:51 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946n-yio1
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0479

Public comment 957. Individual. Becky Poole. 7-9-18

---

## Submitter Information

**Name:** Becky Poole

---

## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It seems that switching the regulatory bodies would switch the focus from humans' best interests to profit.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 7:49 AM <b>Received:</b> July 09, 2018 <b>Status:</b> Posted <b>Posted:</b> July 13, 2018 <b>Tracking No.</b> 1k2-946n-tap5 <b>Comments Due:</b> July 09, 2018 <b>Submission Type:</b> Web
--

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0478

Public comment 958. Individual. Jack Cook. 7-9-18

---

## Submitter Information

**Name:** Jack Cook

**Address:**

46 Nexsen Road  
Kingstree, SC, 29556

**Email:** jscookjr@icloud.com

**Phone:** 8433822209

**Fax:** 8433824881

---

## General Comment

As the owner of a small gunsmithing operation in rural SC I urge the Commerce Department to assume control of small firearms and ammunition from the State Department. It is imperative to my business that we fix the horrible framework that is in place now. Effective 22 July 2016, gunsmiths suddenly found themselves subject to the regulatory authority of the Arms Export Control Act (AECA) as administered by the State Departments Directorate of Defense Trade Controls (DDTC). Regulators suddenly determined that traditionally routine gun repair and enhancement services now constitute firearms "manufacturing" and mandatory registration of my small, home-based business under International Traffic in Arms Regulations (ITAR). Tis ITAR directive advises gunsmiths to stop what they are doing and pay up or face fines and prison! (Violations under the ITAR can bring civil penalties of \$500,000 per violation and criminal penalties of up to \$1 million per violation along with up to 20 years in prison).

These rules are terribly confusing. I submitted some very direct questions to DDTC and have never received a reply. I developed a list of typical customer service requests that raise concern with respect to ITAR registration. Specifically, I requested their determination on these straightforward examples:

- 1) Drilling, threading and installing sling swivels on rifle forend (and buttstock) for sling and/or bipod (requires drill press and screw threading)
- 2) Fabricating replacement parts - such as firing pins for rifles and pistols (requires lathe turning, milling, grinding, and polishing)

- 3) Installation of Cominoli safety special option on Glock pistols (requires cutting of frame slot with Foreman tool and fixture)
- 4) Rifle barrel setback - to correct headspace and service misfire issues (requires lathe and chambering reamer)
- 5) Slide and frame milling and cuts adding cocking serrations for improved handling, chamfering and dehorning for concealed carry, and enhanced eye appeal (requires mill, surface grinder)
- 6) Installation of gunsmith fit barrel - for accuracy upgrade or to address headspace issues (requires milling and/or TIG welding of hood and foot to precise fit)
- 7) Installation of scope mount on early rifles - for hunting, competitive shooting, and sporterizing (requires drilling and tapping of mounting holes)
- 8) Re-crowning barrel - to improve or repair rifle accuracy (using lathe)
- 9) Installing 1911 Beavertail - to improve comfort and aim (requires precision cutting of frame, typically with mill)
- 10) Installing Sako-style extractor on Remington Model 700 rifle - primarily for improved reliability (requires milling and drilling of rifle bolt)

The above are, I think, a typical sampling of services that might reasonably be encountered in any gunsmith practice. I think that common sense will inform that this sort of everyday incidental activity for repair of firearms cannot constitute exportable manufacturing. Under State Department export control rulings all the above would likely constitute manufacturing and are illegal under ITAR absent payment of a large export fee. I urge you to assume administration at the Department of Commerce.

Obviously, the ITAR fee is a significant burden on a small gunsmith shop and will be an important factor in determining the viability and directions of my life endeavor. I am hopeful that the Commerce Department will take over administration and governance of small arms and ammunition manufacturing and repair.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 7:48 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946n-4h2d
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0477

Public comment 959. Individual. Sayre Weaver. 7-9-18

---

## Submitter Information

**Name:** Sayre Weaver

**Address:**

372 Avenida Castilla Unit A

Laguna Woods, CA, 92637

**Email:** sayre.weaver@gmail.com

**Phone:** 213-924-8755

**Fax:** none

---

## General Comment

I am a former Deputy District Attorney and a lawyer for more than 30 years who has spent much of her career representing survivors and victims of gun violence and local governments seeking to address gun violence in their jurisdictions through enactment of commonsense firearms laws. I am opposed to the proposed rule changes for all the reasons set forth in my comment submitted to the State Department. In summary, these proposed rule changes are contrary to the Congressional intent in enacting the statutes that govern arms exports, would reduce end-use controls for gun exports, increase the risk of small arms being trafficked by international human rights violators by eliminating registration of firearms exporters. By moving oversight to Commerce the proposed rule changes would effectively end State's successful and necessary Blue Lantern program, eliminate use of the State Department's database for tracking data related to illegal firearms trafficking abroad, and eliminate Congressional oversight for important firearms export deals. The end result of the proposed changes would be to further fuel armed conflict abroad by treating assault weapons as non-military weapons and moving to Commerce's control, a department whose primary mission is to increase trade, the very weapons research shows are the weapons of choice for gun traffickers, drug traffickers, and criminal organizations abroad.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 7:46 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946o-ursu
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0476

Public comment 960. Individual. Sally Jane Gellert. 7-9-18

---

## Submitter Information

**Name:** Sally Jane Gellert

**Address:**

210 Broadway  
Woodcliff Lake, NJ, 07677

**Email:** SJGUU@aol.com

---

## General Comment

I am wary of the provisions of this change removing the need for a particular purchase order, and allowing entities to get blanket permits; these are weapons, and whether military or nonmilitary, are dangerous and need to be closely watched. I am wary of giving government officials exemptions from the same regulations that the rest of us follow, yes, they are almost certain to not be security risks, but they are all subject to the rule of law; they are not in some sense better than the rest of us. Having a government job should mean that one is subject to more scrutiny and regulation than others, not less; government workers are held to higher standards. Overall, seeing weapons as just another commercial product, which seems to be the direction that these changes take, though some regulation still remains, is a bad choice for a world striving for nonviolence. I oppose these changes.



# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 7:45 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946o-63dx
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0475

Public comment 961. Individual. Sally Jane Gellert. 7-9-18

---

## Submitter Information

**Name:** Sally Jane Gellert

**Address:**

210 Broadway  
Woodcliff Lake, NJ, 07677

**Email:** SJGUU@aol.com

---

## General Comment

To add to my previous comment, another concern is that there will be no notification of large-scale arms sales, even to countries where turmoil is rife, where repressive regimes reign, or where lawlessness is great. Congress needs to stay on top of such transactions, even if the individual weapon is not traditionally a military-grade weapon. I think that there is value to having firearms under control of the Department of State. They are not simply another manufactured product; they are designed to maim and kill. They need special regulations, as currently enacted. It is not simply a question of military advantage, but of ensuring that the movement of deadly items is carefully monitored.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 7:43 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946o-3ygn
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0474

Public comment 962. Individual. Nora Niedzielski-Eichner. 7-9-18

---

## Submitter Information

**Name:** Nora Niedzielski-Eichner

---

## General Comment

I strongly oppose any transfer of oversight of the export of weapons from the State Department to the Commerce Department. Doing so will endanger American security and the security of people around the world.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 7:42 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946o-ptu
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0473

Public comment 963. Individual. Annette Martinez. 7-9-18

---

## Submitter Information

**Name:** Annette Martinez

---

## General Comment

Transferring the regulation of exporting firearms to the Commerce Depart makes the sale of firearms about money rather than safety. History has shown time and again that US exported firearms will be used against US citizens here and abroad.

Here are some of the many reasons rational people are opposed to this change:

- \*Transfers the cost of processing licenses from gun manufacturers to taxpayers.
- \*Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.
- \*Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
- \*Eliminates Congressional oversight for important gun export deals.
- \*Removes statutory license requirements for brokers, increasing risk of trafficking.
- \*Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.
- \*The Commerce Department does not have the resources to enforce export controls.
- \*Reduces transparency and reporting on gun exports.
- \*Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

The State Department is the appropriate agency to regulate the exporting of firearms. The Commerce Depart is not.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 7:35 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946o-ygxy
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0472

Public comment 964. Individual. Hannah Friedman. 7-9-18

---

## Submitter Information

**Name:** Hannah Friedman

---

## General Comment

I am against the proposed rule change to make it easier for U.S. gun manufacturers and dealers to export guns and ammunition globally. This rule would basically be helping to arm those who want to do Americans harm; exported guns and ammunition will almost certainly fall into the hands of terrorist groups, criminal organizations, human rights abusers, and other dangerous groups. Given world events, how can we even consider shipping more arms abroad? The profit gains for American gun and ammunition manufacturers is simply not worth the risk.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 7:34 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946p-o2qu
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0471

Public comment 965. Anonymous. 7-9-18

---

## Submitter Information

**Name:** Anonymous Anonymous

---

## General Comment

Comments from an individual who works with USMLCategory I exporting every day:

Product migration will create a small cost-savings for my company in registration and licensing fees, but more significantly I do not see a demonstrated equivalent in terms of paperwork reduction or real time savings.

Financial savings for smaller manufacturers will be proportionately larger and could increase the pool of available vendors with whom we work, which is a positive. I understand it has been problematic for small companies caught in the registration net due to their manufacturing activities, but whose size/finances cannot absorb the registration fee. This issue is better resolved by changing the definition of manufacturer to add a minimum size requirement..

The licensing process will still involve inter-agency review including staffing out to State Dept. Agencies and DOD. Other than utilizing a different application form and the change in the agency receiving applications, it has not been demonstrated exactly what, if any, process improvement this represents. Caveat: the devil you know is better than the one you don't.

Improvements and savings are quantified using the 43.8 minutes for BIS application vs. the 60 minutes for DDTC application. This metric provides no meaningful data from which to extrapolate total process savings or if any is really generated. It also in no way accounts for the additional significant burden which has been added to the exporting process by increasing the quantity and type of data capture elements which will be required for AES filing, including the need to record individual serial numbers for each firearm. Adding time-consuming elements later in the exporting chain significantly increases the time it takes to complete an export. These new control/requirements are more cumbersome than the current process under the ITAR. They will also increase the burden on an already overloaded CBP.

Recordkeeping changes discuss maintaining warranty certificates for international repair returns. My company does not issue customer specific warranty certificates, and I see this item as an additional record keeping burden which does not relate directly to exporting.

There will be burdens and expenses of transition: reclassification of all product, re-training of all employees, advanced training needed for Compliance personnel. I have not had to utilize SNAP-R previously, nor have I had

to deal extensively with Commerce-controlled exporting other than EAR99 product. There will be a substantial amount of time required to achieve comfort level with a new set of regulations. I understand this burden is considered short term, however the provided rationale for this migration has still not clearly demonstrated a substantial process improvement to warrant the expense and time of this transition.

The EAR does not include a concept of defense services and the technology controls are more narrowly focused and apply in limited contexts as compared to the ITAR. This change represents an improvement in terms of my ability to share information needed for marketing firearms and for repairing them internationally, but the same result could be achieved via amendment to the ITAR, factoring in that there have been few substantive changes to basic firearms technology in the past several decades and that most of this information is already available worldwide.

Maintenance of EAR status of previously classified product: The classification status of items that have been previously determined to be EAR99 product in formal CJ determinations is to remain EAR99 for these items. However, the scope mounts, swivels, accessory rails and iron sights enumerated in y.2 , y.3 and y.4 of 0A501 contradicts this statement and places them under .y control. I would appreciate clarifying language regarding EAR99 status and the removal of these items from .y control.

LVS shipments: the positive effect of the amendment made here by raising the value from the \$100 of 123.17(a) to \$500 is diminished by the change in language from wholesale value to the actual selling price. For relief to be genuine, the \$500 increase should be wholesale value and an additional increase to \$1000 for shipments to Canada, should also be considered. I do appreciate that receivers and breech mechanisms would be eligible for LVS if the destination is Canada.

I concur with the need for an appropriate 180 day delayed effective date for final rule. This amendment represents a major change in business operations and I will need time to completely identify all business operations requiring attention, create an implementation plan and draft appropriate changes in SOPs with accompanying training.

Finally, the rationale for this transition is based upon products being civilian use vs. military. Given that the debate regarding semi-automatic firearms has not been resolved in this country, we could incur transition expenses only to have the entire process reversed.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 7:30 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946p-r4u5
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0470

Public comment 966. Individual. Rachel Gatwood. 7-9-18

---

## Submitter Information

**Name:** Rachel Gatwood

---

## General Comment

I object to the proposed rule change. If the new rule took effect, then many types of firearms exports currently under the control of the U.S. Department of State (DOS) would instead be controlled the Commerce Department, which does not have the resources of the DOS. The Commerce Department could not easily prevent exported firearms from falling into the hands of oppressive regimes, criminals, or terrorists.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 7:29 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946p-csvi
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0469

Public comment 967. Individual. Sandra Wilder. 7-9-187

---

## Submitter Information

**Name:** Sandra Wilder

**Address:**

15832 Norwich Cir

Westminster, CA, 92683

**Email:** swilder650@gmail.com

**Phone:** 7143766909

---

## General Comment

I oppose the proposed rule for the following reasons:

The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit the retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.



The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The Commerce Department is unlikely to make the same argument once those weapons are transferred to their control. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms in the U.S. and around the globe. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could generate many preventable tragedies.

This rule would transfer gun export licensing to an agency the Commerce Department whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries.[5] The export of these weapons should be subject to more controls, not less.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 7:18 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946p-yvb6
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0468

Public Comment 968. Individual. Christopher Grazioso. 7-9-18

---

## Submitter Information

**Name:** Christopher Grazioso

**Address:**

50 Mountainview Road

Millburn, NJ, 07041

**Email:** grazioso415@yahoo.com

**Phone:** 973-376-4315

---

## General Comment

I am opposed to this change. Please retain the current process and policy which provides for the necessary oversight to ensure all sales to foreign parties are appropriate and inline with American values.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 6:54 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946p-c6ce
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0467

Public Comment 969. Individual. Deborah Goodell. 7-9-18

---

## Submitter Information

**Name:** Deborah Goodell

**Address:**

Ridgewood, NJ, 07450-1617

**Email:** debgoodell@optonline.net

**Phone:** 2014472458

---

## General Comment

I am opposed to changing the regulation of firearms exports from the State Department to the Commerce Department for several reasons. Firearms should continue to be classified as "military," and Congress should be allowed to block large sales to foreign countries. Otherwise huge caches of firearms could be sold to countries where human rights pose a grave issue, such as Egypt, Philippines, Turkey, and some Central American countries where the spread of weapons is likely to further destabilize the region and lead to more migration. Furthermore, it is my understanding that the Commerce Department does not have the resources to enforce the export controls that are needed to prevent these weapons from getting into the hands of organized crime or terrorists groups in foreign countries.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 6:54 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946p-c6ce
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0467

Public Comment 969. Individual. Deborah Goodell. 7-9-18

---

## Submitter Information

**Name:** Deborah Goodell

**Address:**

Ridgewood, NJ, 07450-1617

**Email:** debgoodell@optonline.net

**Phone:** 2014472458

---

## General Comment

I am opposed to changing the regulation of firearms exports from the State Department to the Commerce Department for several reasons. Firearms should continue to be classified as "military," and Congress should be allowed to block large sales to foreign countries. Otherwise huge caches of firearms could be sold to countries where human rights pose a grave issue, such as Egypt, Philippines, Turkey, and some Central American countries where the spread of weapons is likely to further destabilize the region and lead to more migration. Furthermore, it is my understanding that the Commerce Department does not have the resources to enforce the export controls that are needed to prevent these weapons from getting into the hands of organized crime or terrorists groups in foreign countries.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 6:52 AM <b>Received:</b> July 09, 2018 <b>Status:</b> Posted <b>Posted:</b> July 13, 2018 <b>Tracking No.</b> 1k2-946p-4zxm <b>Comments Due:</b> July 09, 2018 <b>Submission Type:</b> Web
--

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0466

Public Comment 970. Individual. Barbara Hohlt. 7-9-18

---

## Submitter Information

**Name:** Barbara Hohlt

---

## General Comment

I am writing to oppose the proposed rule that would shift the responsibility of monitoring exports and import of firearms and ammunition from the State Department to the Department of Commerce. The shift would change a lot of current programs and make it far easier for weapons to be exported and divert to areas of conflict throughout the world. The State Department has a mission to reduce arms trafficking and promote peace and has successfully been doing this for years. The Commerce Department is by its name interested in increasing commerce. That is important but not in the area of providing more firearms, including semi-automatic weapons, to countries where they can be easily diverted into areas of conflict.

For instance, taking this monitoring out of the State Department would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. And It would remove licensing requirements for brokers, increasing the risk of trafficking.

It might also have an adverse effect on controlling the 3D printing of firearms. Why would we want to make it easier for gun traffickers and terrorist to get weapons. For the safety of our armed forces and our citizens we should keep the monitoring of exports/imports and of weapons brokers in the Department of State.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 6:49 AM <b>Received:</b> July 09, 2018 <b>Status:</b> Posted <b>Posted:</b> July 13, 2018 <b>Tracking No.</b> 1k2-946p-nu9p <b>Comments Due:</b> July 09, 2018 <b>Submission Type:</b> Web
--

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0465

Public Comment 971. Individual. Frances Carroll. 7-9-18

---

## Submitter Information

**Name:** Frances Carroll

**Address:**

16 Quimby Avenue  
Hamilton, NJ, 08610

---

## General Comment

I am opposed to loosening regulations related to the export of firearms. This is so dangerous, who could be for this, except those who are in the gun manufacturing industry and others who stand to make money from it? Given our national security concerns and in this age of international terrorism, loosening regulations on the export and sale of firearms is just about the worst thing we could do. This measure could potentially increase the chance of dangerous weapons ending up in the hands of international criminals. I do not think this proposal adequately addresses our interests with regards to national security, foreign policy, international crime and terrorist threats. The administration should NOT move forward with this reckless proposal.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 6:46 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946q-493o
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0464

Public Comment 972. Individual. Michael Yantachka

---

## Submitter Information

**Name:** Michael Yantachka

**Address:**

393 Natures Way  
Charlotte, VT, 05445

**Email:** miyantach@hotmail.com

**Phone:** 8024253960

**Fax:** 05445

---

## General Comment

Arms dealing is not just about commerce. Putting firearms sales under the Department of Commerce threatens the security of the United States. All firearms deals outside of the U.S. should have to go through the Department of State as they do now. For an administration that claims to have the security of the country at heart, giving free rein to arms manufacturers to sell to whomever they want will do just the opposite. Keep control of arms sales in the State Department.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 6:45 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946q-o2xy
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0463

Public Comment 973. Individual. Heidi Zollo. 7-9-18

---

## Submitter Information

**Name:** Heidi Zollo

---

## General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would allow firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration

The State Departments Blue Lantern program would be eliminated, which has been in effect since 1940. The Blue Lantern programs carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. If Commerce were responsible for exporting of firearms, then public would likely not know any information about these firearms -- what firearms are going to which countries, regimes, etc. Licencing requirements would be removed for brokers increasing the risk of trafficking -- again what firearms to which countries/regimes.

Another issue is that 3D printing of firearms would be allowed, enabling 3D printing of firearms in the US and around the world.

If firearms regulations remain with the State Department, then Congress can oversee their sales, block sales of large batches of firearms to foreign countries. Congress would not be automatically informed about weapons sales, could not stop exports for national security concerns or to countries where there are serious human rights concerns.

The world would be a more dangerous place if Commerce were to have oversight of firearm exports.



# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 6:43 AM <b>Received:</b> July 09, 2018 <b>Status:</b> Posted <b>Posted:</b> July 13, 2018 <b>Tracking No.</b> 1k2-946q-7d70 <b>Comments Due:</b> July 09, 2018 <b>Submission Type:</b> Web
--

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0462

Public Comment 974. Individual. Nancy Leon. 7-9-18

---

## Submitter Information

**Name:** Nancy Leon

---

## General Comment

Control of firearms needs to stay with the department of state for the safety of our country and the world.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 6:41 AM <b>Received:</b> July 09, 2018 <b>Status:</b> Posted <b>Posted:</b> July 13, 2018 <b>Tracking No.</b> 1k2-946q-6jnw <b>Comments Due:</b> July 09, 2018 <b>Submission Type:</b> Web
--

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0461

Public Comment 975. Individual. Amy Thompson. 7-9-18

---

## Submitter Information

**Name:** Amy Thompson

---

## General Comment

I am against this proposed rule. It would make this country as well as the world more dangerous.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 6:40 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 13, 2018
<b>Tracking No.</b> 1k2-946r-yzpr
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0460

Public Comment 976. Anonymous. 7-9-18

---

## Submitter Information

**Name:** Anonymous Anonymous

---

## General Comment

I oppose this change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This change would negatively impact US national security and should not be implemented. Thank you.

# PUBLIC SUBMISSION

<b>As of:</b> 7/13/18 6:38 AM <b>Received:</b> July 09, 2018 <b>Status:</b> Posted <b>Posted:</b> July 13, 2018 <b>Tracking No.</b> 1k2-946r-jkc9 <b>Comments Due:</b> July 09, 2018 <b>Submission Type:</b> Web
--

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0459

Public Comment 977. Individual. Sue Grele. 7-9-18

---

## Submitter Information

**Name:** Sue Grele

---

## General Comment

I strongly urge the Commerce Department to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. We cannot continue to ignore the fact that gun violence kills one thousand people around the world every day, and we should be making it harder, not easier, to export U.S. made weapons of war.

# PUBLIC SUBMISSION

**As of:** 7/12/18 5:50 PM  
**Received:** July 12, 2018  
**Status:** Posted  
**Posted:** July 12, 2018  
**Tracking No.** 1k2-948l-yoa8  
**Comments Due:** July 09, 2018  
**Submission Type:** Unknown

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0458

Public comment 978. Brownells. Robert McAllister. 7-9-18

---

## Submitter Information

---

## General Comment

See Attached

---

## Attachments

Public comment 978. Brownells. Robert McAllister. 7-9-18



## **Proposed Rule 83 FR 24166 : RIN 0694–AF47**

Regulatory Policy Division, Bureau of Industry and  
Security, U.S. Department of Commerce,  
Room 2099B, 14th Street and  
Pennsylvania Avenue NW, Washington, DC 20230

Steven Clagett,  
Office of Nonproliferation Controls and Treaty Compliance,  
Nuclear and Missile Technology Controls Division  
(202) 482–1641  
*steven.clagett@bis.doc.gov*

It's fair to say Brownells, Inc. has utilized the fullest extent of the ITAR in our industry. We processed thousands of export licenses over the years, covering hundreds of manufacturers and thousands of products. We currently have a very broad WDA including categories I and III with a distribution territory covering nearly all of Europe.

Generally we applaud the changes proposed but have a few comments:

1. Our interpretation of the proposed change regarding firearms magazines is that .x includes magazines under 15 rounds. However, there appears to be no current difference in how .d and .x are controlled (regarding regions, LVS, etc.). State Department licensing policy regarding magazine capacity has often fluctuated within the bounds of the published regulation. Would it be more flexible to remove a regulatory category within the same ECCN that is based on a specific magazine capacity?
2. 0A502 is confusing at first glance (especially in considering the parts of shotguns) - why not incorporate a ".a", ".b", ".c", etc. for shotgun attributes like barrel length?
3. How are accessories of optics, like sunshades or other anti-glare devices to be treated? A simple note might save some time in creating CJs specific to this type of product.
4. Regarding 0B501 .e – What is the definition of "production" equipment? We have many hobbyist customers who wouldn't qualify as a gunsmith let alone as a manufacturer and tools



and equipment designed for hobbyists are quite different than manufacturing equipment... Yet we have a concern these tools will be included in 0B501.e because even the hobbyist is “producing” a firearms part. If there could be some guidance for “production” equipment that clarifies the scope to manufacturing – perhaps “production” would be defined as repeated production of the same or similar parts in multiple quantities per day – this would help clarify the intent a great deal.

5. Serial number reporting for all firearms will cause an additional burden – especially as this is a duplication of effort for permanent exports FFLs will already recording this in the BATFE required A&D “bound book”. Could this reporting be limited to TMP exports? Also, the reporting of Make/model/caliber information in AES will be burdensome considering the scope and variety of our daily shipments.
6. On potential issue is with the record keeping requirement of warranty certificates. An exporter may not have a manufacturer’s (or any other) warranty certificate as part of the transaction. Perhaps some clarification is needed here that this is required only for the manufacturer when they export?
7. How is “technology” defined for 0E501/505? For example: shooting chronographs or empty brass cartridge annealing machines “technology”?

Best regards and thank you for your efforts,

Robert McAllister

VP-Strategic Development  
Brownells, Inc.

200 South Front Street • Montezuma, IA 50171-1000 USA  
Main: 641.623.5401 • Fax: 641.623.3896 • Orders: 800.741.0015

**[www.brownells.com](http://www.brownells.com)**

# PUBLIC SUBMISSION

<b>As of:</b> 7/12/18 5:26 PM
<b>Received:</b> July 02, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 12, 2018
<b>Tracking No.</b> 1k2-948l-e44b
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Unknown

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0457

Public Comment 979. Individual. Andrew Hill. 7-2-18

---

## Submitter Information

---

## General Comment

See Attached

---

## Attachments

Public Comment 979. Individual. Andrew Hill. 7-2-18



Andrew W Hill  
849 Hawks Bridge Road  
Salem N.J. 08079

July 2, 2018

Regulatory Policy Division,  
Bureau of Industry and Security,  
U.S. Department of Commerce,  
Room 2099B,  
14th Street and Pennsylvania Avenue NW,  
Washington, DC 20230.

Re: RIN 0694-AF47

In the matter of the proposed changes to how ITAR is implemented I would like to raise several points of concern.

*First let me say that I welcome nearly all the changes as proposed. My professional background is in ammunition manufacturing. I have patented my own invention and am called upon to act in the capacity of an expert witness in legal matters. In addition to the 20+ years experience I have spent 12 years running the local 4-H Shooting Sports Program in my county. During that time youth from my club have competed in many local and national events. Many have medaled in big matches including one national champion in air rifle.*

Concern #1.

The dollar value placed on exporting bullets (not loaded ammunition) seems impossible to actually kick in and out of skew with the rest of the proposed levels for other items. In many cases this would limit the buyer to only a single box of bullets. Many boxes of bullets, especially ones that are not made in but one or two countries are quite expensive. For example the following is the cost for a box of just 50 bullets.

.348 250 gr = \$43.50

.33 200 gr = \$41.00

38-55 255 gr = \$41.00

.408 350 gr = \$46.00

.404 350 gr = \$59.00

.425 400 gr = \$66.00

43 Spanish 400 gr = \$46.00

.475 #2 500 gr = \$106.50

50-110 450 gr = \$54.50

50-70 450 gr = \$54.00

.505 500 gr = \$72.00

.577 650 gr = \$83.50

Also many common caliber bullets made as a premium hunting bullet in a special weight are equally expensive per bullet.

30 cal 250 gr = \$45.50

32 Rem 170 gr = \$40.00 w/ minimum of 3 boxes

.358 300 gr = \$63.50 w/ minimum of 3 boxes

.416 400 gr = \$50.50

.458 500 gr = \$111.50

50 cal 500 gr = \$68.00

Based upon the other covered items in ITAR it would seem that the \$100.00 is just too low and should be \$300.00 minimum to allow someone with a small purchase of 200 – 300 bullets to reload for an older or odd hunting rifle. This is applicable to brass cartridge cases as well. And both are often purchased together. In all fairness ammunition components should be equal to the \$500.00 level assigned to gun parts.

#### Concern #2.

International competition in small bore rifle may be hurt with the 1,000 round limits on ammunition. Many matches require 100 or 200 shots for record. Usually the event has several days of competition. The match starts with sighters and if conditions are difficult (wind, lighting, and mirage) the rounds fired as sighters in a match can approach the number needed for record. Usually long distance travelers are given the day ahead to check everything and practice before the actual event. A junior shooter competed in Europe then visited the MEC shooting complex for one on one training before returning to the states. The days training was valuable and worth using double the amount of ammunition used in a two day competition. Certain unusual matches require many more record shots. The metric prone event is two days long and consists of 600 record shots. For these reasons I recommend making an exception for small bore 22 rimfire ammunition and allowing 2,000 rounds when traveling out of the country.

I am not aware of the requirements for shotgun competitions but think they are in a similar situation. Gold medalist Kim Rhode practices with 800 shots a day. Perhaps the exemption can be specified for competitors.

Sincerely



Andrew W Hill

# PUBLIC SUBMISSION

<b>As of:</b> 7/12/18 12:39 PM
<b>Received:</b> July 03, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 12, 2018
<b>Tracking No.</b> 1k2-942q-yy2q
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0378

Public Comment 980. Deborah Cake. 7-3-18

---

## Submitter Information

**Name:** Deborah Cake

**Address:**

60 Harvard St  
Winchester, MA, 01890

---

## General Comment

July 3, 2018

Comment on The Bureau of Industry and Security (BIS) Proposed Rule: Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

I couldnt be more astonished and dismayed that the gun lobby and industries are pushing for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business).

Firearms are rightfully categorized as military, and are under the regulation of the State Department. Congress should continue to be automatically informed about sizeable weapons sales and have the authority to stop them when that poses a risk to our national security or threatens to increase human rights violations by facilitating weapons sales to oppressive regimes.

No one anywhere should be allowed to make firearms on a 3- printer. Period!

Arms brokers should always be licensed, to try and prevent unlawful trafficking..

And by no means should the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them, be dismantled.

The existing rules must be maintained and strengthened if switching the regulation of firearms exports from the State Department to the Commerce Department facilitates firearms exports to oppressive regimes, removes safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuels violence that destabilizes countries and causes mass migration.

Do not weaken our fire arm protections by a transfer of authority from the State Department to the Commerce Department. Do not feed into the global oppressors and black market by deregulation.

Thank you for taking this letter, my opinion, seriously.  
Deborah Cake  
01890

---

## **Attachments**

I oppose this BIS rule change that would switch the regulations of firearms export from the U

July 3, 2018

Comment on International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, & III  
The Bureau of Industry and Security (BIS) Proposed Rule: [Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List \(USML\)](#)

*I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.*

I couldn't be more astonished and dismayed that the gun lobby and industries are pushing for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business).

Firearms are rightfully categorized as "military", and are under the regulation of the State Department. Congress should continue to be automatically informed about sizeable weapons sales and have the authority to stop them when that poses a risk to our national security or threatens to increase human rights violations by facilitating weapons sales to oppressive regimes.

No one anywhere should be allowed to make firearms on a 3- printer. Period!  
Arms brokers should always be licensed, to try and prevent unlawful trafficking..  
And by no means should the State Department's Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them, be dismantled.

The existing rules must be maintained and strengthened if switching the regulation of firearms exports from the State Department to the Commerce Department facilitates firearms exports to oppressive regimes, removes safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuels violence that destabilizes countries and causes mass migration.

Do not weaken our fire arm protections by a transfer of authority from the State Department to the Commerce Department. Do not feed into the global oppressors and black market by deregulation.

Thank you for taking this letter, my opinion, seriously.

Deborah Cake

01890

# PUBLIC SUBMISSION

<b>As of:</b> 7/12/18 12:24 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 12, 2018
<b>Tracking No.</b> 1k2-9431-uzq7
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0377

Public Comment 981. Anonymous. 7-4-18

---

## Submitter Information

**Name:** Anonymous Anonymous

---

## General Comment

See attached file(s)

---

## Attachments

I oppose this rule change that would switch the regulations of firearms export from the U

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Congress must not be prevented from being automatically informed about sizable weapons sales. Congress must be able to stop sizable weapons sales in the name of national security, even and especially to countries where there are serious human rights concerns, such as the Philippines and Turkey. Depriving Congress of this ability to monitor these sales is a terrible, dangerous idea. It would open the door to firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Allowing this country to do such an unconscionable thing is not only unamerican, it would directly contribute to making the world a more dangerous place as well as inviting security breaches here at home.

# PUBLIC SUBMISSION

<b>As of:</b> 7/12/18 12:04 PM
<b>Received:</b> July 05, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 12, 2018
<b>Tracking No.</b> 1k2-943s-4hof
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant  
Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant  
Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0376

Public Comment 982. Individual. Barbara Shaw. 7-5-18

---

## Submitter Information

**Name:** Barbara Shaw

**Address:**

20 Roberts Rd  
Boxford, MA, 01921

**Email:** barbarashaw1@mindspring.com

**Phone:** barbarashaw1@mindspring.com

---

## General Comment

See attached file(s)

---

## Attachments

I oppose the rule change



I oppose the rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department which is focused on safeguarding our nation to the U.S. Commerce Department which is focused on promoting American business. With this rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Detailed concerns are that the rule change would eliminate the State Department's Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them; would remove licensing requirements for brokers, increasing the risk of trafficking; and would remove the State Department's block on the 3D printing of firearms. Promoting American business at the risk of further destabilizing the world is a bad deal.

# PUBLIC SUBMISSION

<b>As of:</b> 7/12/18 11:53 AM
<b>Received:</b> July 06, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 12, 2018
<b>Tracking No.</b> 1k2-944h-6hej
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0375

Public Comment 983. National Shooting Sports Foundation. Lawrence Keane. 7-6-18

---

## Submitter Information

**Name:** Lawrence Keane

---

## General Comment

See attached file(s)

---

## Attachments

LGK Ltr - BIS - Proposed Rule Cats I-II-III 6 July 2018



## NATIONAL SHOOTING SPORTS FOUNDATION, INC.

Headquarters: 11 Mile Hill Road, Newtown, CT 06470-2359

400 N. Capitol Street NW, Suite 490, Washington, D.C. 20001

202-220-1340 ext. 249 lkeane@nssf.org

### Lawrence G. Keane

SVP Gov't & Public Affairs

Assistant Secretary & General Counsel

July 6, 2018

By Internet:

Federal eRulemaking Portal: [www.regulations.gov](http://www.regulations.gov) - Docket BIS-2017-0004

By mail or delivery:

Steven Clagett

Office of Nonproliferation Controls and Treaty Compliance

Nuclear and Missile Technology Controls Division

Bureau of Industry and Security

U.S. Department of Commerce

14th Street and Pennsylvania Avenue, NW

Washington, DC 20230

RE: Comments on Proposed Rule – Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML) -- RIN 0694-AF47

Dear Mr. Clagett:

The National Shooting Sports Foundation (NSSF) respectfully submits the following comments to the above-referenced Federal Register Notice (83 FR 24166, May 24, 2018). NSSF is the trade association for America's firearm and ammunition industry.<sup>1</sup> Formed in 1961, NSSF membership includes more than 12,000 manufacturers, distributors, firearms retailers, shooting ranges, sportsmen's organizations, and publishers. We seek to promote, protect, and preserve hunting and the shooting sports, and we offer the following public comments.

### **Summary of High-Level Comments**

The policy justifications for the proposed rule and the corresponding proposed rule by the State Department are described well on Commerce and State Department web pages at:

<https://www.bis.doc.gov/index.php/forms-documents/federal-register-notices-1/2220-cats-i-iii-myths-v-facts-posted-5-24-18/file> and <https://www.state.gov/t/pm/rls/fs/2018/282485.htm>

We encourage all those reviewing the proposed rules and the public comments to read these fact sheets to learn what the proposed regulatory rationalizations of U.S. controls on the export of

---

<sup>1</sup> For additional information on NSSF, please see [www.nssf.org](http://www.nssf.org).

commercial firearms and related ammunition are and, as importantly, are not. So that the policy objectives behind the proposed changes, as well as the “myths” associated with them, are knowable to all those reviewing the proposed rules, we ask the Commerce Department to republish their essential content in the preamble to Commerce’s final rule. In this way, they will be part of the official record and help inform comments on final agency decisions made regarding the proposed rules.

As better described by these fact sheets and in the preambles to the proposed rules, commercial firearms and related items that are widely available in retail outlets that are now subject to the export control licensing jurisdiction of the State Department under the International Traffic in Arms Regulations (ITAR) on its U.S. Munitions List (USML) Categories I, II, and III would be transferred to the licensing jurisdiction of the Commerce Department’s Export Administration Regulations (EAR) in a series of new and coherently organized Export Control Classification Numbers (ECCNs). These proposed rules are the logical continuation of an effort began in 2010 under the Obama Administration to modernize the administration of U.S. export control regulations “to create a simpler, more robust system that eases industry compliance, improves enforceability, and better protect America’s most sensitive technologies.” We agree with the objectives of these bipartisan and widely supported changes. The proposed changes merely align the regulations with the nature of the items at issue, thus more efficiently accomplishing the national security and foreign policy objectives of the controls. Such changes reduce unnecessary burdens for both the U.S. Government and U.S. industry.

We have reviewed the proposed rule thoroughly with our membership. Except with respect to several of our comments set forth below, most members have told us that the final versions of the rules would eventually be beneficial because they would significantly reduce the overall burden and cost of complying with controls on the export of commercial firearms and ammunition. All who responded told us that there would be an initial short-term increase in burden and cost because of the need to re-classify thousands of commodity, software, and technology line items and SKUs affected by the new rules, but that the long-term regulatory burden reduction would significantly outweigh the short-term need to adjust internal compliance programs and practices. There would also be significant short-term costs and burdens associated with the need to become familiar with the nuances of the EAR and new BIS licensing officers. However, this burden, we believe, would be largely addressed by BIS’s long-standing commitment of industry outreach and training resources, which we appreciate.

Our members understand that there would be no change to the licensing policies for end item firearms and related ammunition. If a gun required a license to export when it was regulated by the State Department then it would require a license to export when it is regulated by the Commerce Department. If an export to a particular destination or end user would have been denied or approved before, it would be denied or approved in the same manner under the new rules. Applications would go through the same interagency review process, including by the Defense Department and also the State Department’s human rights and other experts. Under the new rules, no approvals would be converted to denials or denials to approvals.

Nonetheless, most of our members, particularly the small- and medium-sized companies, believe that the changes will be economically beneficial for them because the eventual regulatory

simplification and cost reductions will allow them to consider exporting when they might not have otherwise. Those that already export believe they will be able to expand sales of exports that would have otherwise been approved. They hold these views because BIS and the EAR are simply better able to regulate commercial items than are DDTC and the ITAR. This is not meant to be a slur of DDTC staff, which is excellent. It is merely a reflection of the fact that the ITAR exists to regulate the export of defense articles that provide a significant military or intelligence advantage in a “one size fits all” type approach with regulatory requirements that are more relevant to the export of a fighter aircraft than something that can be purchased at a retail outlet. The EAR exists to regulate dual-use, commercial, and less sensitive military items that warrant control, but in more tailored ways to fit the specific national security and foreign policy, including human rights, issues posed by the items.

These conclusions have been proven thousands of times through the application of similar export control reforms for other sensitive commercial or less sensitive military items that have been transferred to Commerce’s jurisdiction over the course of the last eight years. For example, under the Commerce system, there are no fees to apply for licenses. There are no redundant registration requirements for domestic manufacturers. There are no fees for registration. Such fees are bearable for large companies, but often not for small- and medium-sized companies. The license application forms are vastly simpler. Controls on less sensitive and widely available and basic parts, components, and technology are more tailored and allow for less burdensome trade with close allies through license exceptions. Sales with regular customers can be combined in to fewer license applications, thus reducing overall paperwork to achieve the same policy objectives. **There are many other benefits to the proposed changes as well described in the proposed rules’ preambles, but our essential conclusion is that, particularly with the changes recommended below, they will lead to growth for U.S. companies, more jobs in the United States, and related economic benefits for the cities and states where the members reside while accomplishing the same national security and foreign policy objectives they have always had.**

Notwithstanding our overall approval of the proposed rules, we have the following comments and suggested edits that would make the rules even more efficient and consistent with the overall objectives of the effort.

### **Specific Comments**

#### **I. ECCN 0A501 – Firearms (except 0A502 shotguns) and related commodities as follows (See List of Items controlled)**

##### **A. Subparagraph .e -- Define “Complete Breech Mechanism”**

ECCN 0A501.e includes “complete breech mechanisms,” which is a term carried over from the current USML Category I(g). Neither State nor Commerce has defined this term and industry has struggled over the years with varying, informal definitions of the term. Are they individual bolts or bolt carriers? Are they assembled units of the bolt including all the other minor parts? Or are they firearm actions that include the receiver, all the breech and fire control parts, but without the barrel or stock?

RECOMMENDATION I.A.: To reduce regulatory burden and enhance compliance with the control, we request that BIS define the term in a manner consistent with industry standards, such as “complete breech mechanism, which is defined as an assembled unit consisting of the breech block, plug or bolt, including all parts and components necessary for operation of the mechanism.”

B. Subparagraphs y.2, y.3, and y.4 – Maintain EAR99 Status

We understand the objective of this and other .y subparagraphs created as part of the reform effort, which is to list in one place extraordinarily basic, widely available items that are nonetheless specially designed for controlled items and would otherwise get caught in and over-controlled by .x paragraphs. This is a rational approach and we are not objecting to it in general. However, another equally core and rational element of the reform effort is to not change the classification status of items that have been previously determined to be EAR99 items in formal determinations. ECCN 0A501.y contains the following three types of items we know to have been officially determined to be EAR99 for many years: (i) subparagraph y.2 - Scope mounts and accessory rails; (ii) subparagraph y.3 - Iron sights; and (iii) subparagraph y.4 - Sling swivels.

Converting these types of items to a .y control would thus be inconsistent with the reform effort in general, past practice, and several statements in the proposed rule’s Supplemental Information. For example, the proposed rule states that “for purposes of new ECCN 0A501 and the rest of the new ECCNs described [in the proposed rule], items previously determined to be “subject to the EAR” under a commodity jurisdiction determination issued by the U.S. Department of State **that were designated as EAR99 would generally not be classified in any of the new ECCNs that would be created with this proposed rule.** This would be consistent with Supplement No. 1 to Part 736, General Order No. 5, paragraph (e)(3) (Prior commodity jurisdiction determination) and the paragraph (b)(1) release from “specially designed.” (emphasis supplied). The Supplemental Information section goes on to state, with respect to General Order No. 5, that “items previously determined to be “subject to the EAR” and designated EAR99, would not be classified in a new ECCN being created to control items moved from the USML to the CCL, unless specifically enumerated by BIS in an amendment to the CCL. **“For example, most swivels and scope mounts for firearms have previously been determined through the CJ and classification process to not be ‘subject to the ITAR’ and designated as EAR99. The classification of such ‘parts’ would not be changed, provided the ‘part’ was not subsequently changed, which would require a separate jurisdiction and classification analysis.”** 83 FR at 24172.

The commodity jurisdiction and classification determinations of which our members are aware for mounts, rails, sights, and swivels over the years have concluded that they are EAR99 items, except in specific cases where the part replaces a component of the firearm and is no longer an independent attachment that can be easily removed, or is integrated into a component of the firearm. These conclusions were reflected in the following BIS answer on its FAQ website for firearms: “Q: What is the ECCN for mounts for optical sighting devices for firearms? A: Mounts, bases, rings and rails are EAR99.”

RECOMMENDATION I.B.: We request that the parts in subparagraphs .y.2, .y.3, and .y.4 be removed from ECCN 0A501 and that a Note be added to the ECCN confirming that they remain EAR99 items. The parts are extraordinarily low technology items and widely available throughout the world. If BIS nonetheless determines that controls are needed for certain types of mounts and rails, then we recommend changing the description for subparagraph .y.2 to “scope mounts and accessory rails that are integral to a firearm part or otherwise replace a firearm part necessary for the operation of the firearm.” This revision and split between EAR99 and .y paragraph will allow for the same controls DDTC placed on different types of individual parts.

C. Note 1 to 0A501 – Rationalize Controls Over Antique Firearms and Muzzle Loading Black Powder Firearms

The proposed note states that “Antique firearms (i.e. those manufactured before 1890) and reproductions thereof, muzzle loading black powder firearms except those designs based on centerfire weapons of a post 1937 design, BB guns, pellet rifles, paint ball and all other air rifles are EAR99 commodities.” We appreciate the note, but it would lead to increases in controls on several types of items.

1. Antique Firearms

The Note defines antique firearms as “those manufactured before 1890 and reproductions thereof.” Under the current ITAR controls, antique firearms are controlled under USML Category I(a), but a license exemption exists under 22 CFR § 123.17(b) that allows exports without a license of “firearms covered by Category I(a) . . . if they were manufactured in or **before 1898**, or replicas.” BIS’s proposed definitional change of antique firearm from the ITAR’s 1898 point to 1890 is significant because it will require BIS licensing of certain antique rifles now exempt from license requirements under the ITAR. For example, early Winchester rifle Models 1892, 1894, and similar would be controlled far more strictly than is the case now. There is a significant collector market worldwide for such antique American rifles. U.S. companies and others have used the ITAR exemption to satisfy that demand for years without any threats to American national security or foreign policy objectives.

In addition, both of these controls are more restrictive than the Wassenaar controls which are pre-1890 for antique handguns, but actually are pre-1938 for antique rifles. See <https://www.wassenaar.org/app/uploads/2018/01/WA-DOC-17-PUB-006-Public-Docs-Vol.II-2017-List-of-DU-Goods-and-Technologies-and-Munitions-List.pdf> (page 175 ML1.a, note A).

RECOMMENDATION I.C.1.: We request BIS to revise Note 1 so that the definition of antique firearms is aligned with the Wassenaar controls. If BIS is not willing to consider this change, we request BIS change the date threshold in the definition of antique firearm in Note 1 from 1890 to 1898 so that it is consistent with the ITAR’s exemption.

2. Muzzle Loading Black Powder Firearms

The proposed Note 1 states that “muzzle loading black powder firearms except those designs based on centerfire weapons of a post 1937 design.” This wording is a revision of what is

currently controlled under ECCN 0A018.c, which is “Muzzle loading (black powder) firearms with a caliber less than 20 mm that were manufactured later than 1937 and that are not reproductions of firearms manufactured earlier than 1890.” A note to current 0A018.c states that **“0A018.c does not control weapons used for hunting or sporting purposes that were not “specially designed” for military use** and are not of the fully automatic type, but see ECCN 0A984 concerning shotguns.” (emphasis supplied).

The Note clearly states that those firearms that are used for hunting and sporting purposes are not controlled under that entry. This policy has been in effect for decades with no apparent harm to national security or foreign policy objectives. In the proposed Note 1 to 0A501, however, the statement regarding control of weapons used for hunting and sporting purposes has been removed. The proposed rule also does not state why such a change is necessary. The change is more than a housekeeping edit because it will cause a number of muzzle loading rifles that are now EAR99 items to be controlled as regular firearms under 0A501.a. The new wording also adds confusion by saying muzzle loaders are EAR99 “except those designs based on centerfire weapons of a post 1937 design.” This would add controls to modern muzzle loading rifles that operate with bolt mechanisms but that look like regular centerfire rifles (e.g. Savage ML10), but have completely unique parts that are not compatible with a centerfire rifle that fires conventional cartridges.

RECOMMENDATION I.C.2.: We request BIS to revise Note 1 to delete the phrase “except those designs based on centerfire weapons of a post 1937 design.”

### 3. Combination Firearms

Neither ECCN 0A501 (firearms) nor ECCN 0A502 (shotguns) refer to firearms that are a combination of shotgun and rifle, i.e., that have two barrels. Such combination firearms normally include one rifled barrel which fires conventional cartridges and one smooth-bore barrel that fires shot shells. Some types of combo firearms may be based on shotgun actions, while others may be based on rifle actions.

RECOMMENDATION I.C.3.: We request that BIS state where on the CCL such combination firearms should be controlled.

## II. **0A502 Shotguns; complete trigger mechanisms; magazines and magazine extension tubes; complete breech mechanisms; except equipment used exclusively to treat or tranquilize animals, and except arms designed solely for signal, flare, or saluting use.**

### A. Align Availability of License Exception LVS with 0A501

Unlike ECCN 0A501 (firearms), ECCN 0A502 does not include any list-based license exceptions. The export of, for example, a 0A501 trigger or magazine would be eligible for License Exception LVS but the export of a 0A502 trigger or magazine would not. Thus, the entry, as proposed, would control more strictly without any obvious policy benefit the basic low-value parts and components in 0A502 that would be eligible for LVS exports under 0A501.



RECOMMENDATION II.A.: In order to have consistent controls and exceptions for similar items, we request that BIS allow the use of License Exception LVS for 0A502 parts and components to the same extent proposed for 0A501 for the same types of items, such as shotgun trigger mechanisms, magazines, and magazine extensions. This could be done with the following edits to the proposed rule:

- i. Change the ECCN heading to “Shotguns and related commodities as follows (See List of Items controlled), except equipment used exclusively to treat or tranquilize animals, and except arms designed solely for signal, flare, or saluting use.”
- ii. Include in the List of Items Controlled new subparagraphs to separately list breech mechanisms, and the remaining components (e.g., “including complete trigger mechanisms; magazines and magazine extension tubes”) with a corresponding Reason for Control which allows for use of exception LVS to the same extent as proposed for 0A501.

**B. Define “Complete Breech Mechanism”**

The ECCN 0A502 heading includes the term “complete breech mechanisms” as part of the control. As discussed above, the U.S. government has not defined the term and there is significant industry confusion regarding its meaning.

RECOMMENDATION II.B.: We request that BIS define the term in a manner identical to a definition that would be applicable to 0A501.

**C. Resolve Inconsistency Regarding Use of Term “Combat Shotgun”**

The “Related Controls” part of ECCN 0A502 states that “This entry does not control combat shotguns and fully automatic shotguns. Those shotguns are ‘subject to the ITAR.’” State’s proposed rule, however, would remove references to “combat shotguns” and use the phrase “Fully automatic shotguns regardless of gauge” instead.

RECOMMENDATION II.C.: We request that the reference in 0A502’s “Related Controls” note be made consistent with how such shotguns are referred to in the revised USML Category I.

**III. 0A504 Optical sighting devices for firearms (including shotguns controlled by 0A502); and “components” as follows (see List of Items Controlled)**

**A. Make License Exception LVS Available for 0A504.g Items**

Unlike parts and components for many 0A501 items, the proposed 0A504.g (“Lenses, other optical elements and adjustment mechanisms”) does not allow for the use of License Exception LVS.

RECOMMENDATION III.A.: To align the availability of the exception for similarly significant items on 0A501, we ask that License Exception LVS be available for 0A504.g components, which are insignificant relative to the other items in 0A501. Given the sensitivity of the other optical items in 0A504, we are not requesting such a change for other items in the entry.

B. Note 1 to 0A504.f

The proposed Note 1 to 0A504.f states that “0A504.f does not control laser boresighting devices that must be placed in the bore or chamber to provide a reference for aligning the firearms sights.” There are, however, a variety of bore sighting devices that are placed over the muzzle of the barrel instead of inside the bore or chamber. Such devices perform the same function as those described in the proposed note.

RECOMMENDATION III.B.: We request that this Note be revised to read as follows: “0A504.f does not control laser boresighting devices that provide a reference for aligning the firearms sights. This includes any laser boresighting device, regardless of how it attaches to the firearm (e.g. boresights that fit over the muzzle of the barrel), which performs the same function.”

**IV. 0A505 Ammunition as follows (see List of Items Controlled)**

A. Remove 0A018 and Transfer Controls to 0A505

One of the organizational changes inherent in the reform effort is the movement of military items once controlled in -018 entries into new 600 or 500 series entries. With this change, similar items are clumped together in the same places on the CCL. If an exporter wants to identify the military items on the CCL, it would look to the 600 series entries. The proposed rule follows a similar approach by combining all the various commercial firearm, ammunition, and related items in a new set of 500 series ECCNS. Such changes increase compliance by reducing the risk of an exporter missing a control in a stray ECCN.

RECOMMENDATION IV.A.: We request that all commercial firearm, ammunition, and related items be in one of the series of new 500 series ECCNs and not left behind in legacy -018 entries. Once the items to be controlled in the proposed 0A018.b are moved to 0A505, and controlled in the same manner, then 0A018 could be removed because all its other subparagraphs have already been consolidated with other new ECCNs.

B. Resolve Inconsistencies between Proposed 0A018.b and 0A505

The items described in proposed 0A018.b have been revised and rewritten into the proposed changes to USML Category III and the new ECCN 0A505. Leaving ECCN 0A018.b unchanged would cause confusion and potential compliance mistakes due to the overlap of controlled items as listed in new ECCN 0A505. For example, 0A505.d states that AT-only and UN controls apply to blank ammunition but does not refer to the note in 0A018.b that excludes dummy ammunition for control.

RECOMMENDATION IV.B.: When consolidating the controls of 0A018.b into 0A505, redundancies and inconsistencies should be removed. For example, 0A018.b's control over specially designed components should become part of the standard .x specially designed catch-all provision that is in 0A505. We also request that the de-control note in 0A018.b be transferred to 0A505 so that the current EAR99 status of such items is maintained. If there are policy reasons to remove dummy ammunition from its EAR99 status, we ask that the reasons for control provisions applicable to dummy ammunition in 0A505.d be limited to existing UN and AT-only controls for blank ammunition.

C. Allow for Use of License Exception LVS

Proposed ECCN 0A505 includes an allowance for license exception LVS of \$100 for subparagraph .x "parts" and "components." As discussed, the proposed 0A501 would have an LVS allowance of \$500 for firearm parts and components. This difference will cause additional licensing burden, especially for small and mid-sized ammunition exporters. Ammunition components have seen major increases in cost over the last 10 years. In addition, the higher cost big bore and precision loads are becoming more popular with foreign buyers. This will make the \$100 LVS allowance too low to be relevant to BIS's objectives in proposing it. For example, Norma .470 Nitro Express empty brass is priced at approximately \$4 per unit, or \$100 per box of 25. Under the proposed LVS limit of \$100, only one small box could be exported under the exception. For two boxes, a license would be required.

RECOMMENDATION IV.C.: We request BIS to raise the value limit for the LVS exception to \$500 to match that allowed for firearm components. We believe this is reasonable since the controls in place now under ECCN 0A018.b have an LVS allowance of \$3000 for "specially designed" components and parts for ammunition, and this allowance is much higher than the \$500 we are requesting.

RELATED RECOMMENDATION IV.C.2.: As this example indicates, inflation can alter the policy judgments made with respect to the first allowance for the use of License Exception LVS for items. Thus, we ask BIS to consider pegging and periodically revising License Exception LVS amounts to roughly scale with inflation over time for the items at issue.

**V. 740.9 Temporary imports, exports, reexports, and transfers (in-country) (TMP)**

A. Allow for Use of License Exception TMP to Transfer Items to Affiliates

Revised paragraph 740.9(a) restricts use of License Exception TMP for firearms under 0A501.a and .b, and shotguns with barrel length less than 18" under 0A502. It states: "The only provisions of this paragraph (a) that are eligible for use to export such items are paragraph (a)(5) of this section ("Exhibition and demonstration") and paragraph (a)(6) of this section ("Inspection, test, calibration, and repair")." The revision thus excludes the possible use of paragraph (a)(10) for temporary exports to a U.S. Person's foreign subsidiary, affiliate, or facility abroad if for manufacturing, assembling, testing, producing, or modifying the item. There are a number of US firearm and ammunition manufacturers with foreign parent companies or that have foreign subsidiaries or facilities that would use TMP for the purposes set out in paragraph

(a)(1). Many of these companies use DDTC DSP-73 Temporary Export Licenses in order to send commodities back and forth with their foreign parent or subsidiary particularly since many new products are jointly engineered and require input from both parties. Prohibiting the use of paragraph (a)(10) for transactions between affiliates will cause an unnecessary burden to these companies and one in excess of current burdens under State's existing licensing practices for affiliate transactions.

RECOMMENDATION V.A.: We request BIS to allow for the use of License Exception TMP paragraph (a)(10) for firearms controlled under 0A501.a and .b, and shotguns with barrel length less than 18" under 0A502. DDTC granted similar authorizations without issue for such items. This change would essentially maintain the status quo with DDTC's long-standing practice. Requiring exporters to get licenses from BIS to permanently export items to its affiliates for such joint efforts that are intended to result in products to be returned to the United States would not be efficient.

B. Adjust the TMP Limitation to 100 Firearms per Shipment from 75 per Shipment

Revised TMP paragraph (a)(5) states that "paragraph (a) may not be used to export more than 75 firearms per shipment." This number does not take into account the variety and volume of products that major companies normally export for trade shows. For example, it is not unusual for nearly 100 variations of a company's product line to be sent to the IWA Show in Germany each year.

RECOMMENDATION V.B.: We ask BIS to increase the number of items allowed for temporary export under paragraph (a)(5) to 100 per shipment to more closely align with commercial expectations and practices. This change will not reduce government visibility into what is exported because revised paragraph (a) would require that "the exporter or its agent must provide documentation that includes the serial number, make, model, and caliber of each firearm being exported by filing these data elements in an EEI filing in AES."

C. Provide Guidance Regarding the Import of Goods Temporarily Exported

The proposed rule would add the following sentence to section 740.9(b): "No provision of paragraph (b), other than (b)(3), (b)(4), or (b)(5) of this section, may be used to export firearms controlled by ECCN 0A501.a, .b or shotguns with a barrel length less than 18 inches controlled in ECCN 0A502." This would prohibit the use of License Exception TMP paragraphs (b)(1) (exports of items temporarily in the United States) and (b)(2) (items imported for marketing or display at U.S. exhibitions or trade fairs) for exports of firearms and shotguns with less than 18" barrels.

Paragraph (b)(2) relates to temporary imports for exhibition or marketing. New paragraph (b)(5) essentially replaces (b)(2) insofar as it concerns firearms and certain shotguns. New paragraph (b)(5) details the process for temporary import and subsequent export of these items. The proposed process in this regard is fair and reasonable. It is common practice to cite the regulatory exception for the temporarily imported commodities at the time of import, then

reference the import documents at time of return export of the goods. We believe the process as described will not cause any additional burden to exporters.

RECOMMENDATION V.C.: BIS has provided a clear process for temporary imports under the new paragraph (b)(5). However, the regulations are not clear about the process regarding imports of goods temporarily exported under TMP. We recommend BIS provide similar guidance for temporary exports which explains the process for return importation of the commodities.

D. Allow TMP paragraph (b)(1) to be Used

Paragraph (b)(1) authorizes the temporary import and subsequent export of “Items moving in transit through the United States.” The proposed new sentence in paragraph (b) does not allow this paragraph to be used for firearms controlled by ECCN 0A501.a, .b or shotguns with a barrel length less than 18 inches controlled in ECCN 0A502. Currently, these types of transactions are authorized by DDTC on a DSP-61 Temporary Import License. Requiring a BIS export authorization for items moving in-transit through the US to a third country seems unnecessarily burdensome.

RECOMMENDATION V.D.: We ask BIS amend the new sentence in paragraph (b) and allow use of paragraph (b)(1) for firearms controlled by ECCN 0A501.a, .b or shotguns with a barrel length less than 18 inches controlled in ECCN 0A502.

## **VI. 740.14 Baggage (BAG)**

The purpose of this license exception is to allow individuals to travel overseas with personal baggage, and to make allowances for certain types of controlled commodities. The proposed rule adds a new paragraph (e) “Special provisions for firearms and ammunition.” The revisions regarding use of license exception BAG include requirements for filing data in the Automated Export System (AES), which is extremely problematic for individuals.

The proposed rule states that “BIS is proposing to modify § 758.1 of the EAR to make clear that **exporters would continue to be required to file** Electronic Export Enforcement (EEI) to the **Automated Export System (AES) for transactions involving such firearms and associated ammunition that are otherwise authorized pursuant to License Exception BAG.**” BIS, however, acknowledges the problems related to the requirement for individuals to file data in the AES system when it states that “BIS is aware that U.S. Customs and Border Protection (CBP) has temporarily suspended the requirement to file EEI to the AES for personally-owned firearms and ammunition that are ‘subject to the ITAR’ being exported under 22 CFR 123.17(c), due to operational challenges related to implementation.” BIS goes on to state that “Whether and how BIS includes this requirement in a final rule would be **based on whether CBP is able to update its processes, and other agencies as needed, to allow for individuals to easily file EEI in AES by the time a final rule is published.** If CBP is not able to do so, then the final rule may direct exporters to continue to use CBP’s existing process, which is the use of the CBP Certification of Registration Form 4457, until a workable solution is developed or CBP suggests

an alternative simplified solution for gathering such information for temporary exports of personally-owned firearms and ammunition.”

In 2011, DDTC published a Federal Register notice of proposed rulemaking (76 FR 16353, March 23, 2011) titled “Exemption for the Temporary Export of Chemical Agent Protective Gear” principally revising the exemption related to personal protective equipment, but also including a revision to the firearm exemption as follows: “an exemption for firearms and ammunition is clarified by removing certain extraneous language that does not change the meaning of the exemption.” In fact, the proposed change was much more significant and new wording to be included in the exemption was as follows: “The person . . . presents the Internal Transaction Number from submission of the Electronic Export Information in the Automated Export System per §123.22 of this subchapter. . . .” Neither the title nor the summary of the notice mentioned the substantive modification to the procedures regarding the exportation of firearms and ammunition. The only reference to the change to export requirements was a reference to the removal of “extraneous language.” The notice actually confused the public by stating in the summary that the meaning of the regulations had not changed. As a result, the public was not informed that changes to the exportation process had been proposed and that they should or could provide comments on these possible changes. The rule was published as final on May 2, 2012 (77 FR 25867).

In 2014, DDTC and CBP began enforcing the change, and it caused a major upheaval for individuals travelling overseas with firearms. As BIS noted in the proposed rule, CBP temporarily suspended the requirement for AES filing due to the implementation issues.

There are several reasons why AES is the wrong system for individuals to use:

1. The system is meant for commercial exports. There are a number of required data fields that are not applicable to exports by individuals carrying personal property.
2. The AES system requires an Employer ID Number (EIN) before a user can submit any data. It does not allow individuals to access the system with a Social Security Number. In fact, the allowance for a SSN was removed by Census in 2010 due to privacy concerns.
3. There is conflicting information on the Census website and the IRS website regarding an individual obtaining an EIN. While both agencies have guidance indicating that individuals may obtain an EIN for purposes of filing in AES, **there is no written policy or regulation to support this**. In fact, when the individual requests an EIN, they must make several assertions in the form that the purpose is for establishing a business concern. They are required to sign the form under penalty of perjury, declaring that all the information is true and correct, when in fact the individual is not establishing a business.
4. There are multiple fields in AES related to commercial exports, including port of export, type of export, license codes, and Harmonized Tariff System (HTS)/Schedule B commodity codes. Individuals generally have no knowledge

of this information and at best can only take guesses at the correct data to input. For example, the port of Los Angeles has five different codes. Which one is correct for that person's travel? For commodity codes, how is an individual supposed to understand the complexity of the numbers and pick the correct one? All this information is a common and ordinary part of commercial exports, but not for personal carries.

5. The AES system is implemented under the Foreign Trade Regulations (FTR) which carries authority for penalties for inaccurate information entered into AES, up to \$10,000. Individuals trying to use the AES system are at extremely high risk for penalty because they lack the knowledge to ensure the data is accurately entered in the electronic system. And, as described above, the system is not designed for use by individuals with personal baggage. Therefore, the risk of inadvertent violations is extremely high even with the best compliance intentions.

The BAG exception as revised would thus impose unduly burdensome requirements and compliance traps on hunters, competitive shooters, and other U.S. residents who wish to take firearms out of the country on a temporary basis for lawful purposes. According to American Hunter magazine, there are likely more than 100,000 American hunters who travel abroad every year with their firearms. Typical hunting trips can cost \$10,000 to \$25,000, or more.

Finally, the AES requirement applies only to new paragraph (e)(3) "Special provisions for firearms and ammunition." Current BAG paragraphs (e)(1) and (e)(2) regarding "Shotguns and Shotgun Shells" are not changed, and do not include a requirement for AES filing of export data. BIS has never required AES filing for temporary exports of shotguns under BAG. Until 2012, DDTC had never previously required AES filing for temporary exports of firearms.

RECOMMENDATION VI: As we proposed to DDTC and CBP in 2014, we recommend an alternate to the AES system as follows:

1. Rather than trying to force the AES system to fit the purposes of this data collection, we recommend that CBP develop a simple online interface that uses the individual's passport number as the reference number. Every person leaving or entering the US must present a passport to CBP, and CBP has an electronic system to review the individual's passport data.
2. Under the current process, individuals travelling overseas with firearms are completing the CBP Form 4457 "Certificate of Registration for Personal Effects Taken Abroad" to register their firearm for export and reentry. This form includes details regarding the property being carried as baggage, including details of the firearm (model, caliber, serial number). There have been indications that CBP is planning to implement an electronic version of this paper form. An electronic Form 4457 could be linked to the passport review system. This would allow CBP officers to see not only the individual's passport information, but also any personal property including firearms being taken out of the U.S. and for review upon re-entry to the U.S.

## VII. 743.4 Conventional Arms Reporting

This section details the U.S. obligations for special reporting requirements for exports of certain items listed on the Wassenaar Arrangement Munitions List and the UN Register of Conventional Arms. Participating States of the Wassenaar Arrangement exchange information every six months on deliveries to non-participating states of conventional arms set forth in the Wassenaar Arrangement's Basic Documents. Similar, although not identical, information is also reported by the U.S. Government to the United Nations on an annual basis.

The proposed rule would “revise paragraph (c)(1)(i) and (c)(2)(i) to add ECCN **0A501.a and .b (firearms) as commodities that would require Wassenaar Arrangement reporting and United Nations reporting** under this conventional arms reporting section of the EAR . . . the reporting requirements under § 743.4(c)(1)(i) and (c)(2)(i) would be limited to exports authorized License Exceptions TMP, GOV and RPL.”

The EAR does not now require exporters of any other type of item to make any such reports to the Wassenaar Arrangement. The proposed change would thus unfairly focus additional regulatory burdens that do not now exist on the ITAR or the EAR for exporters of firearms. We do not see any policy benefits for this new obligation, particularly since the US government already would have such information and could continue making such reports as it usually does. For example, under the proposed changes to Part 758 “Export clearance requirements,” new paragraph 758.1(b)(10) requires electronic export information (“EEI”) to be filed for all exports of 0A501 .a or .b firearms in the AES system. This will include exports under exceptions such as TMP, GOV, and RPL. AES records data for every export shipment in real time and would be an instantaneous and reliable method for the U.S. Government (not individual exporters) to gather and sort such information. BIS has reporting responsibility for all exports which the agency approves by export license and therefore already has a process for reporting the required information. We believe that BIS receives daily updates of AES data which includes exports both by license and license exception, and therefore already has the information necessary to comply with the Wassenaar and UN reporting requirements as related to exports under exceptions.

Moreover, we do not believe that any of the Paperwork Reduction Act requirements have been completed for this proposed new collection and reporting obligation. We do not, for example, believe there is a sufficient description of the plan for how the data would be used or that the proposed method has been properly tested to ensure that there is no net increase in regulatory burdens. Or, if there is to be an increase in regulatory burden associated with this new requirement, it is impossible to see how the U.S. government could have come up with an accurate estimate of the new burden based on what is described in the proposed rule. Under Supplement No. 1 to Part 730, it appears that information requests related to Part 743 are included under OMB Collection Number 0694-0137 (License Exceptions and Exclusions). The proposed rule analyzed that collection number with respect to License Exception STA, but the rule did not address the impact of adding the first items to be required to be reported under section 743.4. Moreover, as described, the U.S. government is in a far better position to provide



the requested information that it would already have in its files to the international organization than would be U.S. companies.

RECOMMENDATION VII: We request that BIS delete this new reporting requirement that would impose an unnecessary burden on individual exporters. BIS could far more easily satisfy its obligations to the Wassenaar Arrangement by collecting, sorting, and presenting this information from data it receives from the AES. If BIS nonetheless wants to consider imposing such a novel burden on exporters, we ask that it publish a separate proposed rule on the topic in a manner consistent with the requirements of the Paperwork Reduction Act.

## **VIII. Part 758 Export Clearance Requirements**

### **A. Delete Proposed AES Reporting Requirements**

New paragraph 758.1(g)(4) (“Exports of Firearms and Related Items”) states that “For any export of items controlled under ECCNs 0A501.a or .b, or shotguns with a barrel length less than 18 inches controlled under ECCN 0A502, in addition to any other required data for the associated EEI filing, **you must report the manufacturer, model number, caliber and serial number of the exported items.**” The explanation for the change states this is “to expand the data elements required as part of an AES filing.”

We do not agree with the statement in the proposed rule on page 24180 that such additional requirements would not impose additional new paperwork burdens on exporters. Moreover, we do not believe that this new requirement is compliant with the Paperwork Reduction Act. We do not, for example, believe there is a sufficient description of the plan for how the data would be used or that the proposed method has been properly tested to ensure that there is no net increase in regulatory burdens. Or, if there is to be an increase in regulatory burden associated with this new requirement, it is impossible to see how the U.S. government could have come up with an accurate estimate of the new burden based on what is described in the proposed rule.

We understand that the proposed rule states that the new burden would “ensure law enforcement officials are able to effectively verify that firearms exports are properly authorized and in conformance with all applicable regulations.” We disagree, however, that CBP needs the additional data to verify if the export has been authorized by BIS, either by export license or license exception. CBP’s role is to verify that the shipment consists of commodities approved for export according to the license or exception, not by serial number. Moreover, we question why this data is being required for every export of firearms, and what will be done with the serial number data. In particular, our industry has concerns that aggregating serial number information in this manner could be the start of a firearm registry. None of these issues was apparently addressed in BIS’s or OMB’s PRA analysis. There are many other infirmities with the PRA analysis or the general justification for the new paperwork burden:

1. CBP has a targeted risk assessment program for identifying export shipments which warrant physical inspection. When firearm shipments are thus selected, the exporter provides the CBP officer with copies of the export documents, including packing lists with serial numbers. This is a reasonable basis for review of serial

numbers, and industry does not dispute it. However, CBP does not inspect every firearm export shipment and therefore the rationale to require such records for each shipment is unsupported.

2. Law enforcement agencies, both in the US and abroad, already have an established process with ATF to trace firearms used in crimes. The ATF Tracing Center provides assistance to all international police agencies to assist with their endeavors. Thus, we cannot see why law enforcement would need serial number records of every export shipment of firearms, at the time of export, when the majority of these shipments are never subject to review for illegal activity.
3. This requirement is only applied to firearms controlled under ECCNs 0A501.a or .b, or shotguns with a barrel length less than 18 inches controlled under ECCN 0A502. It does not apply to any other shotguns controlled under ECCN 0A502 which have been under BIS control for decades. Thus, the control is inconsistent with past practice.
4. The serial number requirement is not included in the proposed changes to the ITAR for Categories I, II and III, and therefore is not required for military items such as fully automatic firearms.
5. The AES system does not have the capability to input all the required data. New fields would be needed for each data element. In particular, the volume of firearms exported in a particular shipment can be anywhere from 10 to 1000 units. Requiring this data to be input into an electronic system would be a huge burden and would require companies to spend a massive amount of time and money to establish processes within their IT enterprise systems to input such massive amounts of data.

RECOMMENDATION VIII.A.: We strongly request that BIS delete the new requirement for reporting the manufacturer, model number, caliber and serial number of the exported items in the AES system.

B. Delete Proposed Restrictions in Sections 758.1(c)(1) and 758.10(b)(2)

The proposed change to 758.1(c)(1) would prohibit the use of BAG to export firearms controlled under ECCNs 0A501.a or .b, shotguns with a barrel length less than 18 inches controlled under ECCN 0A502, or ammunition controlled under ECCN 0A505, without the submission by individuals of data in AES. The proposed language in new paragraph 758.10(b)(2) would require non-U.S. persons exiting the U.S. to file export information in the AES system. All the arguments set forth above regarding why AES is the wrong system for individuals to use are equally applicable here. We incorporate them by reference.

RECOMMENDATION VIII.B.: We request that BIS delete the new restrictive wording added to paragraph 758.1(c)(1) and wording in 758.10(b)(2) requiring information to be filed in AES. We note that BIS has indicated that it would only include this requirement if the AES system

was appropriately revised and simplified for use by individuals. Since it is unlikely that such a change could occur prior to publication of a final rule, we request the deletion of the section.

## **IX. Part 762 Recordkeeping**

### **A. Delete Redundant Recordkeeping Requirements**

The proposed revision to section 762.2(a) would add a new subparagraph 11 creating a new recordkeeping requirement for “serial number, make, model, and caliber of 0A501 .a and .b firearms, and shotguns with barrel length less than 18 inches.” This new provision would create an unnecessary and redundant regulatory burden. The Gun Control Act (GCA) is the regulatory framework for records pertaining to firearms. The recordkeeping requirements include acquisition and disposition of all firearms, regardless of whether they are shipped within the US or overseas. The GCA requires all Federal Firearm Licensees (FFL’s) to maintain firearm records. In particular, the GCA requires these records to be maintained for 20 years after the date of disposition. The proposed change requiring records under the EAR is therefore redundant. Further, it could also cause confusion because the EAR record retention period is 5 years, but the GCA’s period is 20 years. In complying with the stated provisions of the EAR, companies may inadvertently violate the GCA.

**RECOMMENDATION IX.A:** We ask BIS to delete the new requirement for “serial number, make, model, and caliber of 0A501 .a and .b firearms, and shotguns with barrel length less than 18 inches.” Instead, we suggest the paragraph make a cross-reference to the GCA-mandated recordkeeping provisions and that compliance with these requirements constitutes compliance with the EAR’s requirements in this regard.

### **B. Remove Proposed Recordkeeping Requirements for Warranties**

Through a proposed exception to existing recordkeeping exemptions in section 762.3(a), BIS would impose recordkeeping requirements “**for a warranty certificate issued for an address outside the US** for any firearm controlled in ECCN 0A501.a and for shotguns with barrel length less than 18 inches controlled in 0A502.” In its preamble, BIS acknowledges that this amendment “would be an **expansion of the EAR recordkeeping requirements**, but because warranty certificates are already created and kept as part of normal business recordkeeping purposes, this expansion is not anticipated to create any new or increased burden under the EAR, because it is a document that is created in the normal course of business and are records that should be easily accessible. These recordkeeping requirements would assist the United States Government because this information is important to have access to for law enforcement concerns for these types of items.” We struggle to see any understandable rationale for this requirement. Such warranties are not related to the export in any way, and a warranty certificate is not an export control document.

Moreover, warranties are issued by the manufacturer, not the exporter. Many manufacturers do not always issue specific “warranty certificates” to individuals. It is, therefore, not a record kept in the normal course of business. Most manufacturers provide warranty statements in a broad boilerplate statement included in an instruction manual, or on their website. There is thus no

way to know when that information is accessed by a foreign person or sent to “an address outside the US.” There is also the possibility that retaining such information may violate the privacy laws of other countries, such as the General Data Protection Regulation (GDPR) (EU).

RECOMMENDATION IX.B.: BIS has asked for comments on whether the public agrees with the above described changes. We do not agree to the changes and have noted that they represent increased compliance burdens for exporters under the EAR that are not present in the ITAR. BIS has not provided a coherent explanation for why the new recordkeeping burden makes sense, is related to exports, or would be of benefit to the enforcement of the export control laws. We therefore request BIS delete the proposed addition.

## **X. Recommendation for Effective Date of Final Rule**

Throughout the reform effort and during transitions of items from the USML to the CCL, the relevant final rules for most other categories had an effective date of 180 days after publication. This gave exporters of those commodities sufficient time to reclassify their products and implement changes in their enterprise systems to become compliant with the EAR. The later effective date also allowed those companies to continue to obtain export licenses from DDTC without loss of business in the interim. The regulatory change for firearms and ammunition will affect many exporters and involve a significant number of export licenses. Most of these companies have had little exposure to the EAR and will require significant training and outreach to understand the new regulations. The extended effective date will allow these firearm and ammunition exporters sufficient time to learn and implement EAR-centric processes and procedures while still continuing to do business in the ordinary course.

RECOMMENDATION X. NSSF recommends a 180-day effective date for the final rule.

## **XI. Items Controlled for Firearms Convention (FC) Reasons Destined for End Use in Canada**

The proposed amendments to section 742.17(f) would require licenses for the export of FC Column 1 items to Organization of American States (OAS) members, including Canada. The items affected are those controlled by ECCNs 0A501 (except 0A501.y), 0A502, 0A504 (except 0A504.f), and 0A505 (except 0A505.d). 83 Fed. Reg. at 24185. Unchanged would be the licensing policy for such items, which is that they be presumptively approved if their export is supported by an FC Import Certificate or equivalent, unless they are for a proscribed end use or end user. 15 CFR § 742.17.

Given the unique and long-standing defense trade and commercial relationships between the United States and Canada, the EAR generally does not require licenses for the export of items from the United States to Canada for end use in Canada, unless a proscribed person or end use is involved. Indeed, none of the uniquely military items that were formerly ITAR controlled that are now subject to the EAR require a license to export to Canada for end use in Canada. Under the proposed rule, however, non-military, widely available commercial FC-controlled items would have stricter licensing obligations than the same items for export to many other NATO

partners. The EAR is, thus, internally inconsistent in its licensing policies with respect to Canada.

We appreciate that BIS does not have discretion to remove completely licensing obligations for the export to Canada for end use in Canada of the shotguns and other items referenced in the proposed revisions to section 742.17(f) given the U.S. commitments to the OAS under the Firearms Convention described in the section. The U.S., however, does have discretion under the convention to define domestically what an OAS-compliant license would be.

RECOMMENDATION XI: Given that applications to export to Canada FC-controlled items will be presumptively approved if the Canadian government has issued to the importer the required possession and import permits, we ask that a proposed rule be created that would allow BIS to treat such Canadian-issued authorizations as satisfying the U.S. government's obligations under the Firearms Convention. If the Canadian government has already approved the import and the importer, there is little value-added in the United States authorizing exactly the same transaction separately. Such a change, we believe, will significantly reduce regulatory burdens -- for both exporters and the U.S. government -- associated with exports to Canada without harming national security objectives or Firearms Convention obligations. Moreover, we do not believe that the creation of such a rule would be a significant burden for BIS because BIS described several times during its weekly conference calls on the reform effort that one had already been created.

\* \* \*

We appreciate your consideration of our comments. We would be happy to respond to any questions or concerns, or provide additional information. I can be reached at [lkeane@nssf.org](mailto:lkeane@nssf.org).

Sincerely,

A handwritten signature in black ink, reading "Lawrence G. Keane". The signature is written in a cursive, flowing style.

Lawrence G. Keane

# PUBLIC SUBMISSION

<b>As of:</b> 7/12/18 11:46 AM
<b>Received:</b> July 06, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 12, 2018
<b>Tracking No.</b> 1k2-944k-mi51
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0374

Public Comment 984. Individual. Beth Katz. 7-6-18

---

## Submitter Information

**Name:** Beth Katz

---

## General Comment

See attached file(s)

---

## Attachments

Beth Katz Public Comment Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

July 6, 2018

To: Office of Defense Trade Controls Policy, U.S. Department of State  
Regulatory Policy Division, Bureau of Industry and Security, U.S. Department of Commerce

In Reference to **FRN 2018-10366** (State) and **83 FR 24166** (Commerce).

-----

I am writing to express my opposition to the proposed regulatory changes published in the Federal Register on May 24, 2018, as "[International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III](#)" (DOS\_FRDOC\_0001-4527) and "[Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List \(USML\)](#)" (83 FR 24166). The proposed changes raise significant concerns for me as a parent, as an American citizen and taxpayer, and as someone who has studied and wrote my graduate thesis on the international small arms trade.

As a parent of a young child, I am deeply concerned about the impact that these changes will have on both global and domestic security for the foreseeable future. The proposed changes would greatly diminish oversight of the export of semi-automatic assault weapons, high capacity ammunition clips and training on such military equipment. The suggested changes would make it more likely that these dangerous weapons will end up in the hands of traffickers, terrorists or cartels and used against US service members. This increases the likelihood for greater destabilization and conflict worldwide as well as for these weapons to be trafficked back into the U.S. for nefarious uses here. The new rule also removes the block on 3D printing of firearms. This will facilitate unregulated gun production in the U.S. and abroad by making it possible for anyone, anywhere, with access to a 3D printer to produce a lethal weapon. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, these changes could generate many preventable tragedies. These proposed changes will create a world that is less safe for my son and other children to grow up in and to live; and therefore should not be adopted.

As an American citizen, I believe that these proposed changes diminish U.S. credibility in the eyes of the international community and compromise our global leadership. The proposed changes call for transferring gun export licensing from the State Department, an agency with a mission to promote stability, conflict reduction, and human rights, to the Commerce Department, an agency with mission to promote trade. In doing this, we are retreating on our global commitment to human rights and acting as though the export of firearms is just another commodity when the impact of these weapons is far more consequential and deadly. Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research shows that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are sought out weapons used by criminal organizations in Mexico and other Latin American countries to perpetrate most of the increasing and record levels of homicides in those countries. The U.S. should not be adopting policies like the proposed changes which amplify this. Rather, we should be working collaboratively, as we have under previous administrations, to find ways to prevent and reduce firearms from being used to carry out human rights violations and crime.

As a U.S. taxpayer, I also find these proposed changes to be fiscally irresponsible. The new rule would transfer the cost of processing licenses from gun manufacturers to U.S. taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of

tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and the Commerce Department does not charge any fee for licensing. This means that U.S. taxpayers, such as me, will absorb the cost of reviewing applications and processing licenses rather than the gun exporters that benefit from these sales. In addition, U.S. taxpayers also will need to shoulder the costs of having to build the capacity and expertise of the Commerce Department to properly administer the proposed changes. The Commerce Department currently does not have resources to enforce export controls, even before the addition of 10,000 firearms export license applicants as a result of this rule predicted by Commerce (see Department of Commerce Budget in Brief FY2017, p. 57, <http://www.osec.doc.gov/bmi/budget/FY17BIB/AllFilesWithCharts2.pdf> ). The Commerce Department's Bureau of Industry and Security's enforcement office, who would be charged to oversee the new changes, does not have staff in Latin America, Africa, or many other parts of the world and is not equipped to take the same level of preventive measures for end-use controls. In stark contrast, the State Department, who oversees these items while they reside on the USML, has developed extensive data, expertise and institutional relations to implement the Leahy Law for security assistance, which can serve as a critical foundation in both pre-license and post-shipment checks to control and verify end uses and end users. The Commerce Department does not have these resources and developing them will come at a substantial cost to U.S. taxpayers.

Finally, as someone who has studied and researched the international small arms trade, I can confidently say that greater regulation, not less as the proposed rule would enable, is needed to curb the disproportionate impact that these weapons have on fueling conflict, terrorism, and crime around the world. One particularly troubling part of the new rule is its reduction of end-use controls for gun exports. It would eradicate the State Department's Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department within State that compiles the U.S. Government's information on human rights violations, decreasing the ability to effectively stop weapons licenses from going to international human rights violators. End-use controls also are weakened by removing the registration of firearms exporters, a requirement since the 1940s. Under the current rules, registration of exporters lets the State Department check an exporter's history whenever a manufacturer or broker requests a license for a particular gun export sale. Migrating the licensing to the Commerce Department will remove new exporters and brokers of these firearms from the State Department database, losing an important part of the evidentiary trail that enables the prosecution of arms traffickers.

It is for all the reasons listed above that I urge you to reject the proposed changes and to keep the items currently listed on the State Department-administered US Munitions List (USML) intact.

Thank you for your time and consideration.

Sincerely,

Beth Katz  
Omaha, Nebraska



# PUBLIC SUBMISSION

<b>As of:</b> 7/12/18 10:51 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 12, 2018
<b>Tracking No.</b> 1k2-946f-n3f7
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0355

Public Comment 985. Catholic Health Initiatives. Colleen Scanlon. 7-9-18

---

## Submitter Information

**Name:** Colleen Scanlon

**Organization:** Catholic Health Initiatives

---

## General Comment

See attached letter.

---

## Attachments

CHI\_Overseas gun sales\_final

*Submitted via regulations.gov*

July 9, 2018

Wilbur Ross  
Secretary  
Regulatory Policy Division  
Bureau of Industry and Security  
U.S. Department of Commerce  
Room 2099B  
1401 Constitution Avenue NW  
Washington, DC 20230

Mike Pompeo  
Secretary  
Office of Defense Trade Controls Policy  
Directorate of Defense Trade Controls  
U.S. Department of State  
2201 C Street NW  
Washington, D.C. 20520

**RE: RIN 0694-AF47 (Commerce) and RIN 1400-AE30 (State)**

Dear Mr. Ross and Mr. Pompeo,

Catholic Health Initiatives appreciates the opportunity to comment on the proposed rules to address the Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML). Catholic Health Initiatives (CHI) is a faith-based nonprofit health system operating in 18 states with 100 hospitals and numerous other services and facilities that span the inpatient and outpatient continuum of care. As a Catholic organization, we feel a special call to reduce violence in our communities and around the world.

While these proposed rule touches many aspects of firearm regulation, sales and oversight, CHI is particularly concerned about the transfer of weapon sale regulation from the State Department to the Commerce Department and the negative effect this may have on violence around the world. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

July 9, 2018

Rather, the rule proposes to transfer gun export licensing to the Commerce Department, whose principle mission is to promote trade.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. The types of weapons being transferred to Commerce Department control—including the AR-15, AK-47, and other military-style assault rifles and their ammunition—are among the deadliest personal-use weapons produced in the United States. We also understand they are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries. The export of these weapons should be subject to more controls, not less.

**We should not export American violence solely to boost economic development, competitive advantage, or other commerce-related goals. We strongly urge the Departments of Commerce and State to rescind this proposed rule.**

Thank you for consideration of our comments on this important issue. If you have any questions, please contact me at 303-298-9100 or contact Laura Krausa, Director of Advocacy, at [laurakrausa@catholichealth.net](mailto:laurakrausa@catholichealth.net).

Sincerely,

A handwritten signature in cursive script that reads "Colleen Scanlon".

Colleen Scanlon, RN, JD  
Senior Vice President and Chief Advocacy Officer

# PUBLIC SUBMISSION

<b>As of:</b> 7/12/18 10:44 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 12, 2018
<b>Tracking No.</b> 1k2-946i-ymie
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0351

Public Comment 986. Violence Policy Center. Kristen Rand. 7-9-18

---

## Submitter Information

**Name:** Kristen Rand

**Address:**

1025 Connecticut Ave NW

Suite 1210

Washington, DC, 20036-5421

**Email:** krand@vpc.org

**Phone:** 2023874525

**Organization:** Violence Policy Center

---

## General Comment

The comments of the Violence Policy Center are attached.

---

## Attachments

Exports comments VPC Commerce RIN 0694-AF47

**COMMENTS OF THE VIOLENCE POLICY CENTER TO THE U.S. DEPARTMENT OF COMMERCE,  
BUREAU OF INDUSTRY AND SECURITY**

**RE: RIN 0694-AF47**

**Submitted via eRulemaking Portal**

The Violence Policy Center (VPC) is a national non-profit educational organization working to reduce gun violence through research, public education, and advocacy. The VPC has a particular expertise in researching and monitoring the gun industry and we regularly issue reports and analyses regarding the industry and its products. The VPC has also done extensive research on cross-border gun trafficking.

The VPC has serious concerns regarding the rules proposed by the U.S. Departments of Commerce and State to transfer non-automatic and semi-automatic firearms and ammunition, as well as parts and related defense services currently controlled by Category I, II, or III of the U.S. Munitions List under the International Traffic in Arms Regulations (ITAR), to the control of the Export Administration Regulations (EAR). The proposed transfer would significantly weaken controls on small arms and ammunition and will result in a higher volume of export sales with less transparency and oversight. The ability to prosecute violations will also be impaired. The changes will enhance the risks that lethal weapons widely used for military purposes will end up in the hands of criminal organizations, human rights abusers, and terrorist groups.

The proposed rules treat semi-automatic assault rifles as “non-military.” But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. VPC research clearly demonstrates that the types of semi-automatic rifles, handguns, sniper rifles, large-capacity ammunition magazines, receivers, and other parts subject to the new rules are the types of weapons and accessories preferred by cross-border gun traffickers.<sup>1</sup> Moreover, many of the sniper rifles subject to the transfer are in use by military forces.<sup>2</sup> One particularly problematic rifle is the 50 caliber anti-armor sniper rifle that is capable of downing

---

<sup>1</sup> *An Ongoing Analysis of the Types of Firearms Illegally Trafficked from the United States to Mexico and Other Latin American and Caribbean Countries as Revealed in U.S. Court Documents*, Violence Policy Center: <http://www.vpc.org/indicted/>.

<sup>2</sup> “5 Sniper Rifles That Can Turn Any Soldier into the Ultimate Weapon: 5 guns no one wants to go to war against,” *The National Interest*, March 11, 2018: <http://nationalinterest.org/blog/the-buzz/5-sniper-rifles-can-turn-any-soldier-the-ultimate-weapon-24851>.

aircraft on take-off and landing and can pierce light armor.<sup>3</sup> In addition, these rifles have been identified as a national security threat by a number of experts and entities.<sup>4</sup>

The devastation that semi-automatic firearms equipped with large-capacity ammunition magazines can inflict is demonstrated by their common use in mass shootings in the United States.<sup>5</sup>

Regarding whether the items described in the proposed rules are widely available in commercial outlets, an issue about which comment has been requested, many of the items are rapidly becoming less available in the United States. Six U.S. states and the District of Columbia prohibit retail sale of semi-automatic assault rifles. Eight states and the District of Columbia ban large-capacity ammunition magazines. Several large retail chain stores have acted to stop the sales of semi-automatic firearms and large-capacity ammunition magazines. For example, Walmart does not sell semi-automatic assault weapons. The store does not sell handguns, except in Alaska. They also do not sell large-capacity ammunition magazines.<sup>6</sup>

Other large retail outlets, such as Dick's Sporting Goods, have recently acted to stop the sales of semi-automatic assault weapons (which the gun industry euphemistically calls "modern sporting rifles"). Dick's is even destroying its unsold inventory of assault weapons.<sup>7</sup> Finally, many countries prohibit civilian possession of semi-automatic rifles and handguns and the trend is toward prohibiting such weapons. For example, Norway is moving to ban semi-automatic firearms as of 2021. In 2011, Norway experienced one of the worst mass shootings outside of the U.S. The shooter used a Sturm Ruger Mini-14 semi-automatic rifle and a Glock semi-automatic handgun to kill 69 people at a youth camp. Both of these weapons are examples of those that will be transferred to Commerce's control under the proposed rules.

---

<sup>3</sup> For more information on the capabilities of 50 caliber sniper rifles, see the Violence Policy Center's resource page: <http://www.vpc.org/regulating-the-gun-industry/50-caliber-anti-armor-sniper-rifles/>.

<sup>4</sup> *National Security Experts Agree: 50 Caliber Anti-Armor Sniper Rifles Are Ideal Tools for Terrorists*, Violence Policy Center, 2005: [http://www.vpc.org/fact\\_sht/snipersecurityexperts.fs.pdf](http://www.vpc.org/fact_sht/snipersecurityexperts.fs.pdf).

<sup>5</sup> See, for example, Violence Policy Center list of mass shootings involving high-capacity ammunition magazines: [http://www.vpc.org/fact\\_sht/VPCshootinglist.pdf](http://www.vpc.org/fact_sht/VPCshootinglist.pdf).

<sup>6</sup> Walmart Statement on Firearms Policy, accessed on July 3, 2018: <https://news.walmart.com/2018/02/28/walmart-statement-on-firearms-policy>.

<sup>7</sup> "Dick's Sporting Goods plans to destroy all the assault rifles it pulled off its shelves," *CNN*, April 19, 2018: <https://www.cnn.com/2018/04/19/us/dicks-sporting-goods-guns-trnd/index.html>.

Many semi-automatic rifles are also easily converted to fully-automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

The rules will enable the production and distribution of 3D-printed firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printed firearms, the State Department successfully charged him with violating arms export laws since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The Commerce Department is unlikely to take similar action once such weapons are transferred to their control. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms in the U.S. and around the globe. This change alone could generate many preventable tragedies while changing the landscape of firearm manufacture, distribution and regulation.

The proposed rules would revise License Exception BAG to allow U.S. citizens and permanent resident aliens temporarily leaving the U.S. to take up to three non-automatic and semi-automatic firearms and up to 1,000 rounds of ammunition for such firearms for personal use while abroad (License Exception BAG). Currently, BAG applies only to non-automatic firearms. The proposed rules create a new exception for semi-automatic firearms and also revise the current rule to allow nonresident aliens leaving the U.S. to take firearms “accessories,” “attachments,” “components,” “parts,” and ammunition controlled by 0A501 or 0A505, provided that these were lawfully brought into the U.S.

The revision to the License Exception BAG is highly problematic considering that semi-automatic weapons can inflict catastrophic damage. If such a weapon is stolen or lost, there will little that can be done to recover the weapon. It will also be much easier for smugglers to take advantage of these exceptions to facilitate trafficking.

No justification is offered for changes to the current BAG framework. As described previously, semi-automatic weapons are prized by criminal organizations and the proposed change is likely to increase the risk of crime and violence.

The proposed rules would eliminate Congressional oversight for important gun export sales. Congress will no longer be automatically informed about sizable sales of these weapons. This change will limit the ability of Congress to comment on related human rights concerns, as it recently did on the Philippines and Turkey. In 2002, Congress acted to require it be notified of sales of firearms regulated by the U.S. Munitions List valued at \$1 million or more. Items moved to Commerce’s control would no longer be subject to such notification. In a September 15,

2017, letter, Senators Ben Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate congressional intent and effectively eliminate congressional oversight.<sup>8</sup>

The rules reduce end-use controls for gun exports. It would eliminate the State Department's Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Government's information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporter's history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.

Gun manufacturers are extolling the new rules as an opportunity for increased profits in a climate of declining domestic sales.<sup>9</sup> At the same time, the new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking weapons production would no longer apply to manufacturers of semi-automatic firearms. The government and taxpayers will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.

## CONCLUSION

The proposed rules would transfer gun export licensing to an agency – the Commerce Department – the principal mission of which is to promote trade. Firearms are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the

---

<sup>8</sup> Letter to Secretary of State Rex Tillerson, September 15, 2017.

<sup>9</sup> "Trump State Department Looks to Stream Line Firearms Exports & Open US Markets," *Ammoland*, May 15, 2018: <https://www.ammoland.com/2018/05/trump-state-department-looks-to-stream-line-firearms-exports-open-us-markets/#axzz5KDSk0Jdz>.



types of weapons being transferred to the Commerce Department's control – including AR-15, AK-47, and other military-style assault rifles such as 50 caliber sniper rifles as well as their ammunition – are weapons of choice for criminal organizations in Mexico and other Latin American countries and are responsible for most of the increasing and record levels of homicide in those countries. The rules are certain to increase the volume of exports of these firearms. The export of these weapons should be subject to more controls, not fewer.

The proposed rules would significantly weaken export controls and oversight of many military firearms highly prized by terrorists, drug-trafficking organizations, and common criminals. Semi-automatic assault rifles, high-capacity ammunition magazines, sniper rifles (especially 50 caliber sniper rifles), and high-caliber firearms should remain on the United States Munitions List (USML).

The requirement that Congress be notified of all sales of former and USML-controlled firearms of more than \$1 million should be retained.

The provision authorizing license-free exports of semi-automatic rifles by citizens and legal permanent residents should be removed.

Respectfully submitted,

Kristen Rand  
Legislative Director  
Violence Policy Center  
1025 Connecticut Ave NW  
Suite 1210  
Washington, DC 20036

# PUBLIC SUBMISSION

<b>As of:</b> 7/12/18 10:40 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 12, 2018
<b>Tracking No.</b> 1k2-946i-gs5d
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0350

Public Comment 987. American Bar Association\_Security Assistance Monitor and by Amnesty International USA. John Lindsay-Poland. 7-9-18

---

## Submitter Information

**Name:** John Lindsay-Poland

**Address:** United States,

**Email:** johnlindsaypoland@gmail.com

---

## General Comment

The below comment on the proposed rules by the Departments of State and Commerce supplements the comments submitted by the American Bar Association/Security Assistance Monitor and by Amnesty International USA, which we support. Please see the attached version for complete comment, sources, and notes.

The State Department proposed rule states that those weapons that would stay on the USML are inherently for military end use, adding that the items to be removed from the USML do not meet this standard, including many items which are widely available in retail outlets in the United States and abroad. One State Department official reportedly said: We kind of refer to it as the Walmart rule. If its like something you can buy at a Walmart, why should we have control?

The Commerce Departments description of criteria for items to be moved off of the USML concludes: Thus, the scope of the items described in this proposed rule is essentially commercial items widely available in retail outlets and less sensitive military items. (p. 4) It adds that: There is a significant worldwide market for firearms in connection with civil and recreational activities such as hunting, marksmanship, competitive shooting, and other non-military activities. However, the examples given here are not from prospective importing nations, but from the United States: Because of the popularity of shooting sports in the United States, for example, many large chain retailers carry a wide inventory of the firearms described in the new ECCNs for sale to the general public. Firearms available through U.S. retail outlets include rim fire rifles, pistols, modern sporting rifles, shotguns, and large caliber bolt action rifles, as well as their parts, components, accessories and attachments.

Retail availability in the U.S. should not be a criterion, since this is not the market to which exports treated by the proposed rule will be directed. Moreover, the U.S. retail firearms market is qualitatively and quantitatively

different from nearly every market in the world: with 4.4% of the worlds population, the U.S. comprises more than 45% of the worlds firearms in civilian possession.

In addition, the statement neglects another significant portion of the worldwide market for firearms: criminal organizations, illegal armed groups, and armed security forces that commit human rights violations.

In many countries, retail availability of all firearms is substantially limited. In Mexico, for example, there is only one retail outlet in the entire country for the legal purchase of any kind of firearm. In the vast majority countries, according to one of the few studies of firearms regulations, there is a presumption against civilians owning firearms unless certain conditions and requirements are met. (S. Parker, Small Arms Survey, 2011)

Many nations either do not permit or highly restrict civilian use of some or all types of semi-automatic firearms and high-capacity magazines proposed for removal from the USML, and so cannot be said to have any retail availability of these prohibited firearms. Within the United States, semi-automatic rifles and high-capacity magazines are prohibited for retail sale in six states and the District of Columbia. Certain types of handguns and certain calibers of firearms that are included in Category I are also prohibited and not available for retail purchase in some countries.

That purchase and possession of certain types firearms and ammunition are permitted under national legislation does not necessarily indicate that these items are either widely available or feasible for most people to obtain. Many countries deeply restrict retail availability of all firearms through licensing requirements, which are often extensive and time-consuming.

States impose limitations on the retail availability, types of firearms that may be legally purchased, and licensing process for parties seeking to purchase a firearm because they recognize that guns are not like ordinary commercial items that can be purchased at a store. In many countries, legal markets for firearms blend with illegal markets in vast grey areas of stolen and diverted weapons. The potential and actual negative consequences of the ill use of such firearms are devastating. A coherent, ethical, and politically strategic approach to firearm exports would increase controls to help reduce violent harm by both state and non-state actors that will more easily acquire them under the proposed rules.

The proposed rules do not articulate any requirement for a review by State Department experts on human rights and criminal organizations. If that is the proposers intent, the rule should state it clearly, and spell out the scope of license applications subject to such review, concurrences required, specifying from which bureaus and agencies, and the competencies of experts who shall conduct reviews.

John Lindsay-Poland, Global Exchange

---

## **Attachments**

GlobalExchange comment 9july2018

**Comment on Proposed Rules on Categories i-ii-iii by Depts. of State and Commerce**  
John Lindsay-Poland, Global Exchange

The below comment on the proposed rules by the Departments of State and Commerce supplements the comments submitted by the American Bar Association/Security Assistance Monitor and by Amnesty International USA, which we support. This comment focuses on the proposed criterion of wide retail availability for firearms and munitions proposed for transfer from the USML to the Commerce Department, and includes brief comments about inter-agency review and about risks of criminal use.

The State Department proposed rule states that those weapons that would stay on the USML “are inherently for military end use,” adding that the items to be removed from the USML “do not meet this standard, including many items which are widely available in retail outlets in the United States and abroad.” (p. 5) One State Department official was quoted in a press report about the proposed rule: “We kind of refer to it as the Walmart rule. If it’s like something you can buy at a Walmart, why should we have control?”<sup>1</sup>

The Commerce Department’s description of criteria for items to be moved off of the USML concludes: “Thus, the scope of the items described in this proposed rule is essentially commercial items widely available in retail outlets and less sensitive military items.” (p. 4) It adds that: “There is a significant worldwide market for firearms in connection with civil and recreational activities such as hunting, marksmanship, competitive shooting, and other non-military activities.” (pp. 6-7) However, the examples given here are not from prospective importing nations, but from the United States:

“Because of the popularity of shooting sports in the United States, for example, many large chain retailers carry a wide inventory of the firearms described in the new ECCNs for sale to the general public. Firearms available through U.S. retail outlets include rim fire rifles, pistols, modern sporting rifles, shotguns, and large caliber bolt action rifles, as well as their ‘parts,’ ‘components,’ ‘accessories’ and ‘attachments.’” (p. 7)

The retail availability in the United States should not be a criterion, since this is not the market to which exports treated by the proposed rule will be directed. Moreover, the U.S. retail firearms market is qualitatively and quantitatively different from nearly every market in the world: the United States, with 4.4% of the world’s population,<sup>2</sup> comprises more than 45% of the world’s firearms in civilian possession.<sup>3</sup>

In addition, the statement neglects another significant portion of the “worldwide market for firearms”: criminal organizations, illegal armed groups, and armed security forces that commit human rights violations.

In many countries, the retail availability of all firearms is substantially limited. In Mexico, for example, there is only one retail outlet in the entire country for the legal purchase of any kind of firearm.<sup>4</sup> In China, firearm purchases are banned for most people, and private gun ownership is almost unheard of.<sup>5</sup> In the vast majority countries, according to one of the few studies of firearms regulations, “there is a presumption against civilians owning

firearms unless certain conditions and requirements are met.”<sup>6</sup>

Belize, Colombia, Israel, Japan, Kenya, Turkey, and United Kingdom do not permit any civilian use of some or all types of semi-automatic firearms proposed for removal from the USML, and so cannot be said to have any retail availability of these prohibited firearms.<sup>7</sup> Other nations, including Australia, Canada, Croatia, India, Lithuania, New Zealand, South Africa, Switzerland apply special restrictions to civilian possession of semi-automatic firearms, such as proof that they are needed for self-defense, and so it cannot be said that these firearms are “widely available in retail outlets” there. We emphasize that these examples are from only a selected sample of 28 countries; a full accounting of countries where there is only limited or any retail availability of semi-automatic firearms would certainly show many more.<sup>8</sup> Brazil also prohibits “assault weapons” for civilian purchase, while Chile and Colombia prohibit civilian possession of semi-automatic weapons entirely.<sup>9</sup>

Moreover, within the United States, semi-automatic rifles and high-capacity magazines such as those proposed to be removed from the USML are prohibited for retail sale in six states and the District of Columbia.

Magazines with a capacity of more than 10 rounds are not permitted for civilians in Australia.<sup>10</sup> Brazil, France, Romania, Slovenia, Spain, and Turkey do not permit purchase by ordinary civilians of high-capacity magazines.<sup>11</sup> DDTC policy has reportedly excluded export of high-capacity magazines except to military and law enforcement end users,<sup>12</sup> but nothing in the proposed rule indicates that the Department of Commerce would enact such a policy.

Certain types of handguns and certain calibers of firearms that are included in Category I are also prohibited and not available for retail purchase in some countries. In the Dominican Republic, for example, “certain firearms are considered ‘war weapons’ and can only be used by government forces, including .45 calibre pistols [and] rifles,” according a Small Arms Survey study,<sup>13</sup> while Spain prohibits civilian purchase of firearms with a caliber of 20 mm or higher, which are considered to be “designed for war use.”<sup>14</sup> More types – in some cases all types - of handguns are prohibited for civilian purchase in Belize, Canada, Colombia, Japan, Kazakhstan, the Russian Federation, the United Kingdom, and Venezuela.<sup>15</sup>

That purchase and possession of certain types firearms and ammunition are permitted under national legislation does not necessarily indicate that these items are either widely available or feasible for most people to obtain. In addition to prohibitions or restrictions on retail availability of types of firearms, many countries deeply restrict retail availability of all firearms through licensing requirements, which are often extensive and time-consuming. In India, for example, obtaining a license to acquire a firearm requires the applicant to demonstrate training in use of a gun, and often takes years.<sup>16</sup> Japan requires gun buyers to go through 12 processes before purchasing any type of firearm.<sup>17</sup>

States impose limitations on the retail availability, types of firearms that may be legally

purchased, and licensing process for parties seeking to purchase a firearm because they recognize that guns are not like ordinary commercial items that can be purchased at a store. In many countries, legal markets for firearms blend with illegal markets in vast grey areas of stolen and diverted weapons, and of private security companies. The potential and actual negative consequences of the ill use of such firearms are devastating.<sup>18</sup> A coherent, ethical, and politically strategic approach to firearm exports would increase controls to help reduce violent harm by both state and non-state actors that will more easily acquire them under the proposed rules.

Processes for gun exports reflect substantive priorities and as such are integral to policy. The National Sports Shooting Foundation (NSSF) claims that under the proposed rule, “Applications would go through the same interagency review process, including by the Defense Department and the State Department’s human rights and other experts.”<sup>19</sup> However, the proposed rules do not articulate any requirement for such a review by State Department experts on human rights and criminal organizations. If that is the proposers’ intent, the rule should state it clearly, and spell out the scope of license applications subject to such review, concurrences required, specifying from which bureaus and agencies, and the competencies of experts who shall conduct reviews.

---

<sup>1</sup> David Sherfinski, “Trump officials to roll back rules on some gun exports,” *The Washington Times*, May 1, 2018, <https://m.washingtontimes.com/news/2018/may/1/trump-officials-to-roll-back-rules-on-some-gun-exp/>. It should also be noted that Walmart does not operate in more than 100 nations (see: <https://corporate.walmart.com/our-story/our-locations> and that in the United States Walmart does not sell semi-automatic assault rifles, high capacity magazines, or even (except in Alaska) handguns. See: <https://news.walmart.com/2018/02/28/walmart-statement-on-firearms-policy>.

<sup>2</sup> <https://www.census.gov/popclock/>

<sup>3</sup> Aaron Karp, *Estimating Global Civilian-Held Firearms Numbers*, Small Arms Survey, June 2018, at: <http://www.smallarmssurvey.org/fileadmin/docs/T-Briefing-Papers/SAS-BP-Civilian-Firearms-Numbers.pdf>

<sup>4</sup> Kate Linthicum, “There is only one gun store in all of Mexico. So why is gun violence soaring?” *The Los Angeles Times*, May 24, 2018, <https://www.latimes.com/world/la-fg-mexico-guns-20180524-story.html>.

<sup>5</sup> Ben Blanchard, “Difficult to buy a gun in China, but not explosives,” Reuters, October 2, 2015, at: <https://www.reuters.com/article/uk-china-security-idUSKCN0RV5QV20151002>.

<sup>6</sup> Sarah Parker, “Balancing Act: Regulation of Civilian Firearm Possession,” chapter 9 in *States of Security: Small Arms Survey 2011*, Small Arms Survey, Geneva, p. 6, at: <http://www.smallarmssurvey.org/fileadmin/docs/A-Yearbook/2011/en/Small-Arms-Survey-2011-Chapter-09-EN.pdf>.

<sup>7</sup> Parker, pp. 9-13; Law Library of Congress, *Firearms-Control Legislation and Policy*, 2013, at: <http://www.loc.gov/law/help/firearms-control/firearms-control.pdf>.

<sup>8</sup> Parker, pp. 2, 9-13.

<sup>9</sup> Lisandra Paraguassu, Ricardo Brito, “U.S. biggest source of illegal foreign guns in Brazil – report,” *Reuters*, January 10, 2018, <https://af.reuters.com/article/worldNews/idAFKBN1EZ2M3>.

David Gacs, Rachel Glickhouse, and Carin Zissis, “Gun Laws in Latin America’s Six Largest Economies,” Americas Society, January 11, 2013, <https://www.as-coa.org/articles/explainer-gun-laws-latin-americas-six-largest-economies>.

<sup>10</sup> Law Library of Congress, p. 20.

<sup>11</sup> “Overview of gun laws by nation,” at: [https://en.wikipedia.org/wiki/Overview\\_of\\_gun\\_laws\\_by\\_nation](https://en.wikipedia.org/wiki/Overview_of_gun_laws_by_nation). France: <https://www.service-public.fr/particuliers/vosdroits/F2242>. Romania: <http://www.gandul.info/reportaj/exclusiv-20-000-de-romani-s-au-inarmat-in-2011-fostul-sef-de-la-arme-din-politie-stii-cat-e-valabil-avizul-psihiologic-pana-iesi-pe-usa-cabinetului-9375494>.

---

<sup>12</sup> Clif Burns, “High Capacity Magazines Exported from U.S. to Norway Shooter,” *ExportLaw Blog*, July 28, 2011, at: <https://www.exportlawblog.com/archives/3315>.

<sup>13</sup> Parker, p. 8.

<sup>14</sup> Law Library of Congress, p. 219.

<sup>15</sup> Parker, pp. 9-13; Gacs, Glickhouse and Zissis.

<sup>16</sup> Rama Lakshmi, “India already had some of the world’s strictest gun laws. Now it’s tightened them,” *Washington Post*, August 1, 2016, [https://www.washingtonpost.com/world/asia\\_pacific/india-had-the-one-of-the-strictest-gun-laws-in-the-world-it-just-got-tighter/2016/08/01/affd9422-51da-11e6-b652-315ae5d4d4dd\\_story.html?utm\\_term=.f69ad52bfff](https://www.washingtonpost.com/world/asia_pacific/india-had-the-one-of-the-strictest-gun-laws-in-the-world-it-just-got-tighter/2016/08/01/affd9422-51da-11e6-b652-315ae5d4d4dd_story.html?utm_term=.f69ad52bfff).

<sup>17</sup> 1. Take a firearm class and pass a written exam, which is held up to three times a year. 2. Get a doctor’s note saying you are mentally fit and do not have a history of drug abuse. 3. Apply for a permit to take firing training, which may take up to a month. 4. Describe in a police interview why you need a gun. 5. Pass a review of your criminal history, gun possession record, employment, involvement with organized crime groups, personal debt and relationships with friends, family and neighbors. 6. Apply for a gunpowder permit. 7. Take a one-day training class and pass a firing test. 8. Obtain a certificate from a gun dealer describing the gun you want. 9. If you want a gun for hunting, apply for a hunting license. 10. Buy a gun safe and an ammunition locker that meet safety regulations. 11. Allow the police to inspect your gun storage. 12. Pass an additional background review. Audrey Carlsen and Sahil Chinoy, “How to Buy a Gun in 15 Countries,” *The New York Times*, March 2, 2018, <https://www.nytimes.com/interactive/2018/03/02/world/international-gun-laws.html>.

<sup>18</sup> Brazil provides an important example. See Rogert Muggah, “Where do Rio de Janeiro’s crime guns come from?” *openDemocracy*, August 8, 2016, <https://www.opendemocracy.net/democraciaabierta/robert-muggah/where-do-rio-de-janeiros-crime-guns-come-from>.

<sup>19</sup> Larry Keane, “Why export control reform makes security and business sense,” National Shooting Sports Foundation, July 6 2018, <https://www.nssf.org/why-export-control-reform-makes-security-and-business-sense/>.

# PUBLIC SUBMISSION

<b>As of:</b> 7/12/18 10:19 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 12, 2018
<b>Tracking No.</b> 1k2-946j-v4k9
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0349

Public Comment 988. Security Assistance Monitor Center for International Policy. Colby Goodman. 7-9-18

---

## Submitter Information

**Name:** Colby Goodman

**Address:**

2000 M St NW

Suite 720

Washington, DC, 20036

**Email:** colby@ciponline.org

**Phone:** 2022323317

---

## General Comment

Please find attached Security Assistance Monitor-Center for International Policy's concerns with the proposed firearms export changes.

Colby Goodman

Director

Security Assistance Monitor

Christina Arabia

Program and Research Associate

Security Assistance Monitor

William D. Hartung

Director

Arms and Security Project

---

## Attachments







Advancing a sustainable, just, and peaceful world

---

July 9, 2018

Mr. Steven Clagett  
Office of Nonproliferation Controls and Treaty Compliance  
Nuclear and Missile Technology Controls Division  
Bureau of Industry and Security  
U.S. Department of Commerce  
Room 2099B, 14th Street and Pennsylvania Avenue NW  
Washington, DC 20230

**Re: Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML), RIN 0694–AF47**

Dear Mr. Clagett,

We are writing to express our concerns about the U.S. Department of Commerce’s proposed rule, published in the Federal Register on May 24, 2018, to transfer certain firearms, guns, ammunition, and related parts from the U.S. Department of State’s U.S. Munitions List (USML) to the U.S. Department of Commerce’s Commerce Control List (CCL) under a new 500 series designation. While we were pleased to see that the proposed rule maintained some important controls connected with the USML for the firearms moving to the CCL, we believe the proposed rule will mean more U.S. firearms will be exported with less transparency, fewer oversight mechanisms, and a weaker ability for the U.S. government to prosecute violations.

First, the transfer of certain firearms, guns, and ammunition from USML to the CCL appears to be fundamentally inconsistent with the scope of statutory authority outlined in the Arms Export Control Act (AECA). For more than three decades, the U.S. government has designated many types of firearms and guns that are proposed to move to the CCL as “Significant Military Equipment” (SME) because of their “substantial military utility or capability.” According to the AECA, all defense articles designated as SME must be on the USML. While there may be more civilians using these types of weapons now than in the 1970s, most foreign militaries continue to use these types of firearms as standard issue and they continue to have substantial military utility. Moreover, the proposed rule’s assertion that the firearms moving over to the CCL, including “Combat Shotguns” and

.50 sniper rifles, has “for the most part,” “civil, recreational, law enforcement, or other non-military applications” and thus deserve limited controls is highly questionable.

Second, because the term “defense article” is linked to several statutes with national security import, the removal of firearms, guns, ammunition, and certain parts from the USML means there would be many rippling implications of the transfer of items from the USML to the CCL under the AECA and the Foreign Assistance Act (FAA). The AECA is a sophisticated statutory framework that enables the United States to more effectively monitor a large volume of arms exports. The proposed transfer impacts various statutes linked to the AECA more broadly and creates ambiguity with the ability of Congress to monitor U.S. assistance to foreign countries through various notification and reporting requirements found in the AECA and the FAA. The transfer of arms to the CCL would undermine that framework.

As outlined in more detail in the below analysis, the U.S. government or the U.S. policy community would lose many key oversight tools and abilities to help prevent irresponsible or illegal firearms trafficking around the world as a result of these proposed changes. In particular, the U.S. government or U.S. policy community (Congress and the public) would have a limited ability to do the following:

- Halt or modify risky proposed firearms sales valued at \$1 million or more to countries such as to Honduras, Turkey, or the Philippines;
- Curb risky exports of pistol grips and magazine clips valued at \$500 or less to over 100 countries, including Mexico and Guatemala;
- Review proposed training on how to aim and fire a gun and other types of foreign police training to countries such as Libya or China;
- Stop nonresident aliens leaving the United States via commercial airlines from taking firearms “accessories,” “attachments,” “components,” “parts,” and ammunition;
- Better understand U.S. firearms manufacturing and ownership to identify risks within the U.S. firearms industry; and,
- Investigate and prosecute companies for failing to properly provide political contributions and marketing fees aimed at curbing corruption.

Additionally, the AECA only permits the sales of defense articles and services for specific reasons, including primarily for legitimate defense purposes.<sup>1</sup> Section 3 of the AECA requires the State Department to notify Congress when there is credible information that such articles or services were misused.<sup>2</sup> However, there is not a similar requirement connected with the Export Administration Regulations (EAR). The AECA also requires the State Department to publicly report on all authorized and delivered arms exports annually, which has provided Congress and the public with an essential tool to identify potentially illegal trafficking patterns and sales that are inconsistent with U.S.

---

<sup>1</sup> 22 U.S.C. § 2754.

<sup>2</sup> 2753(c)(2), <https://www.law.cornell.edu/uscode/text/22/2753>; For more information, see [https://www.americanbar.org/content/dam/aba/administrative/human\\_rights/ABACHRAssessmentofArmsSalestoSaudiArabia.authcheckdam.pdf](https://www.americanbar.org/content/dam/aba/administrative/human_rights/ABACHRAssessmentofArmsSalestoSaudiArabia.authcheckdam.pdf)

policy. However, the Commerce Department does not have this same requirement nor does it regularly provide the same level of transparency as the State Department.

We are pleased to see that the proposed rule attempts to maintain effective oversight of arms brokers by ensuring that brokers must register and seek a license. These provisions are critical in helping mitigate illegal arms trafficking to major conflict zones and transnational criminal organizations. However, we are concerned that the basis for the State Department's rules is subject to legal challenge because it is not clear that the State Department has the statutory authority to maintain brokering controls if firearms are transferred from the USML. Similarly, we are concerned about the U.S. government's statutory basis to halt arms transfers based on human rights concerns. In 2014, Congress amended the FAA to prohibit the export of Series 600 items to countries "the governments of which engage in a consistent pattern of gross violations of internationally recognized human rights."<sup>3</sup> If the proposed rule moved forward as is, the State Department would no longer have a statutory basis for vetoing a proposed sale on human rights grounds for firearms, guns, ammunition, and related parts that move to the CCL.

Given the potential loss of so many U.S. arms export controls and likely negative impact on curbing irresponsible and illegal arms transfers, we encourage you to wait until the Government Accountability Office finishes its analysis of the risks of moving firearms from the USML to the CCL until you move forward on this proposal. If you have decided you want to move forward with moving some firearms, guns, and related parts over to the CCL, we recommend making the below changes to the proposed rule:

- Recognize that semi-automatic firearms are still a weapon of choice for foreign militaries and of significant military value and place firearms under the 600 Series list on the CCL;
- Maintain the requirement to notify Congress and the public of any proposed firearms sales that reach \$1 million or more;
- Limit companies use of the Limited Value Shipments (LVS) license exception to \$100 or severally limit the types of parts and components that are available for the \$500 threshold value;
- Expand the definition of "technology" to capture defense-service type activities that would otherwise be left unregulated such as private security contractor training to foreign police with firearms. Similarly, 3D printing should be considered technology under the EAR;
- Remove or limit the registration fee for manufactures but keep the requirement for the registration;
- Add a mechanism to the CCL that would retain the reporting requirement on political contributions and marketing fees that were paid as part of arms sales.

---

<sup>3</sup> 22 U.S.C. Sec. 2304. 22 USC 2304(a) establishes that no security assistance can go to a country with consistent pattern of gross human rights. 22 USC 2304(d)(2)(C)(ii) defines security assistance to include a license of 600-series items intended for armed forces, police, intelligence or other internal security forces.

For more details on some of these concerns, we are pleased to submit the below report, which provides more details on these main concerns and recommendations. We look forward to speaking with you or any of your colleagues about these important issues. Thank you for the opportunity to submit our comments and recommendations.

Sincerely,



Colby Goodman  
Director  
Security Assistance Monitor

Sincerely,



Christina Arabia  
Program and Research Associate  
Security Assistance Monitor



William D. Hartung  
Director,  
Arms and Security Project

## **Section-by-Section Key Concerns on Proposed Firearms Export Rule**

### **Congressional Notification Requirement**

#### **Proposed Change**

Under Section 36(c) of the AECA,<sup>4</sup> if a sale of \$1 million worth of Category I firearms is authorized for export under the ITAR, the President must formally notify Congress 30 days prior to the approval of the ITAR export authorization. Both this formal notification process and the prior informal one provides Congress with the opportunity to review these proposed sales and ensure they are consistent with U.S. law, policy, and interests. Under the current system, if Congress does not agree with the executive branch decision to license the firearms export, it may block or modify the proposed sale. If Category I items are moved to EAR controls, they will not be subject to the AECA notification requirement.

#### **Main Concerns**

In the mid 1990s, Congress began requiring the administration to notify it of proposed firearms sales of \$1 million or more because of concerns about the role firearms have consistently played in inflicting serious harm on civilians in conflict and non-conflict zones. Since then, the requirement has allowed both Congress and the public to provide important oversight of U.S. firearms exports. Over the past ten years, Congress has also halted or modified several particularly problematic proposed firearms sales. Just last year, for instance, Congress blocked the sale of semi-automatic handguns and assault rifle sales to the Philippines and Turkey because of concerns that they would be used unlawfully against civilians.<sup>5</sup> As these congressional notifications are often provided to the public, they have also given the U.S. foreign policy community an opportunity to provide insights on particular risky U.S. firearms sales.

As U.S. companies continue to propose firearms sales to risky countries, it is critical for Congress to maintain its oversight on major sales. From January to December of 2017, the Trump Administration requested Congress to approve at least \$662 million in Category I firearms and ammunition exports to over 15 countries through the congressional notification process.<sup>6</sup> Of these, potential firearms sales to El Salvador, Honduras, Indonesia, Mexico, Thailand, Turkey, and the United Arab Emirates raised concerns amongst the human rights community and required necessary scrutiny by Congress. In the case of Honduras, Congress had raised several questions to help ensure

---

<sup>4</sup> 22 U.S.C. § 2776(c)

<sup>5</sup> <http://www.middleeasteye.net/news/us-halts-arms-sales-erdogan-bodyguards-1467964562>;  
<https://www.reuters.com/article/us-philippines-usa-rifles-idUSKBN12V2AM>

<sup>6</sup> For more details see Security Assistance Monitor's factsheet, "Congressional Notifications for Proposed U.S. Commercial Firearms Exports in 2017," available at [http://securityassistance.org/fact\\_sheet/congressional-notifications-proposed-us-commercial-firearms-exports-2017](http://securityassistance.org/fact_sheet/congressional-notifications-proposed-us-commercial-firearms-exports-2017)

that U.S. weapons would not be used to fire on civilian protestors. These notifications also helped U.S. civil society identify important trends in U.S. firearms sales such as in licensed production.

## **Recommendation**

For these reasons, it is critical that the new rule continue to require the U.S. administration to notify Congress of any proposed firearms sales that reach \$1 million or more.

## **License Exception LVS (§ 740.3) / License Exception BAG (§ 740.14)**

### **Proposed Changes**

Under the proposed rule, U.S. companies are given new opportunities to export certain firearms parts and components without U.S. government prior approval if the net value of the shipment is at or below \$500, which is higher than the \$100 threshold under ITAR. In particular, U.S. companies can use the Commerce Department's License Exception Shipments of Limited Value (LVS) to avoid the license requirement for exports of certain firearms "parts," "components," "accessories," and "attachments", including pistol grips and detachable magazines, to over 100 countries in Country Group B.<sup>7</sup> Guns and armament and related items controlled under ECCN 0A602 are also eligible for LVS with a limit of \$500 net value per shipment. Further, the rule adds a license exception under LVS for ammunition parts and components with a limit of \$100 per shipment.

The proposed rule would also revise License Exception BAG to allow U.S. citizens and permanent resident aliens temporarily leaving the United States to take up to three non-automatic *and* semi-automatic firearms under 0A501 and up to 1,000 rounds of ammunition for such firearms controlled under 0A505.a for personal use while abroad. Currently, BAG is authorized only for non-automatic firearms. The proposed rule carves out a new exception for semi-automatic firearms and revises the current framework to allow nonresident aliens leaving the U.S. to take firearms "accessories," "attachments," "components," "parts," and ammunition controlled by 0A501 or 0A505, provided that these were lawfully brought into the United States.

### **Main Concerns**

Over the past decade, U.S. criminal prosecutions and research studies have shown how the smuggling of small numbers of firearms on a regular basis can have a large impact on gun violence in Mexico and Central America.<sup>8</sup> Indeed, trafficking experts have long

---

<sup>7</sup> See <https://www.bis.doc.gov/index.php/documents/regulation-docs/452-supplement-no-1-to-part-740-country-groups/file>.

<sup>8</sup> Small Arms Survey, "Drips and Drabs: The Mechanics of Small Arms Trafficking from the United States," Issue Brief, March 2016, online at <https://www.files.ethz.ch/isn/196408/SAS-IB17-Mechanics-of-trafficking.pdf>.

argued that “small arms and spare parts are the lifeblood of the gray market.”<sup>9</sup> Instead of trying to improve U.S. efforts to stop this smuggling, the proposed rule seems more aimed at limiting or complicating U.S. government efforts to stop the smuggling of U.S. firearms and relate parts. The new \$500 net value per shipment value under LVS could significantly expand the number of shipments of firearms components such as pistol grips and magazine clips that the U.S. government will not have a chance to review. Similarly, the expansion of the license exception BAG will likely make it harder for the U.S. government to stop the export of potentially problematic exports of semi-automatic firearms at the U.S. border to many countries around the world, including Mexico and in Central America.

***Parts and Components Under LVS:*** Under the proposed changes to LVS, U.S. companies could export the following types of firearms parts and components without a U.S. license to over 100 countries, including Guatemala, El Salvador, Mexico, Somalia, South Sudan, Yemen, and the Philippines if the net value per shipment was \$500 or less:

- 1) “barrels, cylinders, barrel extensions, mounting blocks (trunnions), bolts, bolt carriers, operating rods, gas pistons, trigger housings, triggers, hammers, sears, disconnectors, pistol grips that contain fire control “parts” or “components” (e.g., triggers, hammers, sears, disconnectors) and buttstocks that contain fire control “parts” or “components;” and,
- 2) “detachable magazines with a capacity of greater than 16 rounds “specially designed” for a commodity controlled by paragraph .a or .b of this entry. “

The rule also allows companies to use the LVS for guns and armament related items under ECCN 0A602 in addition to ammunition parts, which can easily be used to make one’s own ammunition.<sup>10</sup> As many of these parts are relatively inexpensive, especially if used, it’s possible for companies or individuals to export many items in one shipment without a U.S. license. Following common practice, firearms traffickers may also increase their number of shipments of firearms components that significantly increase lethality such as pistol grips and magazine clips to questionable clients. Taken together, the U.S. government will lose the ability to stop many types of sales to problematic destinations and end-users.

***Semi-Automatic Firearms Under BAG:*** Over the past five years, U.S. researchers have highlighted how individuals have successfully trafficked U.S. firearms to Mexico and Central America and beyond via commercial airlines using temporary export licenses similar to the BAG license exception.<sup>11</sup> While anyone traveling on a plane needs to

---

<sup>9</sup> Willian J. Lowell, Comments on Public Notice 7256 Amendment to the International Traffic in Arms Regulations: Revisions of U.S. Munitions List Category VII; and Public Notice 7257 Revisions to the USML (Feb. 7, 2011)

<sup>10</sup> [https://www.armscontrol.org/system/files/Lowell\\_Comments\\_ExportReform\\_Feb7\\_2011.pdf](https://www.armscontrol.org/system/files/Lowell_Comments_ExportReform_Feb7_2011.pdf)  
<https://taskandpurpose.com/ammo-expensive-heres-make/>; <https://www.skilledsurvival.com/how-to-make-your-own-ammo/>; <https://www.offthegridnews.com/self-defense/guns-ammo/what-will-i-need-to-make-my-own-ammo/>

<sup>11</sup> Small Arms Survey, “Dribs and Drabs,” March 2016. Colby Goodman, “U.S. Firearms Trafficking to Guatemala and Mexico,” Working Paper, Woodrow Wilson Center, April 2013, online at



declare their firearm(s) to a U.S. CBP officer at the port of departure, CBP officers do not conduct a risk assessment similar to what the State or Commerce Department would do to help prevent U.S. firearms from being misused or diverted at the destination point. In addition, if a U.S. person overseas is robbed of or loses a semi-automatic firearm, there is little recourse from the United States. Nefarious actors who are cognizant of this exception could more easily facilitate semi-automatic firearm transfers abroad acting in concert with a U.S. citizen or permanent resident alien.

Not dissimilar from the points mentioned in the section on LVS, it is also troublesome that the BAG exception allows for nonresident aliens leaving the United States to take firearms “accessories,” “attachments,” “components,” “parts,” and ammunition controlled by 0A501 or 0A505. The U.S. government lacks jurisdiction over nonresident aliens while abroad. This exception will increase the number of firearms parts and ammunition that are currently allowed to be transported overseas, many of which are already contributing to epidemic levels of violence in Latin America.<sup>12</sup> In fact, as many as a quarter to half of all guns seized by police in Honduras, Guatemala, and El Salvador and submitted for tracing by the Bureau of Alcohol, Tobacco, Firearms and Explosives have been sourced to the United States.<sup>13</sup>

## **Recommendation**

For these reasons, we believe the proposed BAG provision authorizing license-free exports of semi-automatic rifles by citizens and legal permanent residents be revised to allow the U.S. government to have more oversight before such a license exception is used. In order to allow the U.S. government to review many risky license requests of firearms components around the world, we also encourage you to limit companies use of LVS to \$100 or severally limit the types of parts and components that are available for the \$500 threshold value.

## **Controls on the Export of Services and 3D Printing**

### **Proposed Change**

Under the ITAR, companies must apply for a license with the State Department to export “defense services” to foreign entities. Defense services include items such as providing assistance or training to foreign persons in the design, development, manufacture, production, repair, maintenance, and operation of weapons on the USML. Companies must also request a license if they seek to provide military training to foreign units and forces. However, the Commerce Department’s CCL does not have a similar defense services rule for items moving from the USML to the CCL. Instead, EAR controls are

---

[https://www.wilsoncenter.org/sites/default/files/US%20Firearms%20to%20Guatemala%20and%20Mexico\\_0.pdf](https://www.wilsoncenter.org/sites/default/files/US%20Firearms%20to%20Guatemala%20and%20Mexico_0.pdf)

<sup>12</sup> New Data Reinforces Link Between Guns, Violence in Latin America, available at

<https://www.insightcrime.org/news/brief/new-data-reinforces-link-guns-violence-latin-america/>.

<sup>13</sup> American Guns Drive the Migrant Crisis That Trump Wants to Fix With a Wall, available at

<https://www.thetrace.org/2017/05/gun-trafficking-central-america-immigrant-crisis-trump-wall/>.

focused more on technology transfers. Additionally, the new rule would likely mean that the U.S. companies would no longer be prohibited from publishing 3D gun plans on the Internet.

## Main Concerns

As the current rule is written, the U.S. government will likely lose oversight on many types of defense services that could pose real risks to U.S. national security interests. Today, U.S. defense companies regularly receive U.S. approval to provide over \$40 billion in defense services a year to over 100 countries.<sup>14</sup> Under the proposed rule, however, U.S. companies may be able provide a wide range of training activities, design and development assistance, testing, and production assistance on firearms and ammunition to foreign persons without sufficient U.S. oversight. In particular, a U.S. company would likely no longer be required to obtain U.S. government approval before they provided training to foreign security forces around the world on how to aim and fire certain guns. Further, when anyone that has access to 3D printing machines is able to obtain plans on how to build a gun, this circumvents U.S. laws that seek to prevent known criminals from obtaining U.S. firearms.

***Narrow Definition of Technology:*** As the proposed rule identifies “the EAR does not include a concept of ‘defense services’ and the ‘technology’ related controls are more narrowly focused and apply in limited contexts as compared to the ITAR.” The technology “required” for the development, production, or operation of semi-automatic firearms would be controlled. But the definition of “required” as applied to “technology” relates only to that portion of “technology” which is “peculiarly responsible for achieving or exceeding the controlled performance levels, characteristics or functions.” Therefore, training a foreign person in the United States or abroad would only require a license if the assistance involved the release of controlled technology. That means companies may be able to provide a wide range of training activities, design and development assistance, testing, and production assistance on firearms and ammunition to foreign persons without sufficient scrutiny and oversight.

***Private Security Contractors:*** As U.S. private security contractors continue to pursue training opportunities with foreign security forces in countries such as Libya and China, it remains critical that the U.S. government maintain oversight of U.S. private security contractor activities.<sup>15</sup> At the moment, a U.S. private security contractor seeking to sell training to foreign police units on how to aim and fire semi-automatic weapon must

<sup>14</sup> Security Assistance Monitor, Arms Sales Database, Direct Commercial Sales Services, accessed on July 6, 2018, online at <http://securityassistance.org/data/country/arms/Direct%20Commercial%20Sales%20Services/2017/Global/all>.

<sup>15</sup> Matthew Cole and Jeremy Scahill, “Eric Prince in the Hot Seat,” *The Intercept*, March 24, 2016, online at <https://theintercept.com/2016/03/24/blackwater-founder-erik-prince-under-federal-investigation/>. Marc Fisher, Ian Shapira, and Emily Rauhala, “Beyond Eric Prince’s China Venture,” *The Washington Post*, May 4, 2018, online at [https://www.washingtonpost.com/news/world/wp/2018/05/04/feature/a-warrior-goes-to-china-did-erik-prince-cross-a-line/?noredirect=on&utm\\_term=.15fb0693b992](https://www.washingtonpost.com/news/world/wp/2018/05/04/feature/a-warrior-goes-to-china-did-erik-prince-cross-a-line/?noredirect=on&utm_term=.15fb0693b992)

obtain a license. But, the new rule would likely allow a U.S. company to avoid this license requirement if the company did not also export firearms as part of the training. It also means that some past enforcement actions, such as the deferred prosecution agreement with the private security company formerly known as Blackwater, which included violations related to the export of small arms, ammunition, and training of foreign security forces in Sudan, Iraq, and Afghanistan, could be compromised.<sup>16</sup> The new rule could also create an unfortunate scenario where U.S. private security contractors are able to provide services to foreign security units or militias that are otherwise prohibited from receiving training through U.S. foreign security aid.

**3D Printing:** In *Defense Distributed v. United States Department of State*, 838 F.3d 451 (5th Cir. 2016), the Fifth Circuit determined that posting 3D gun instructions, which constituted an export of controlled technical data under the ITAR, was not an infringement on the First Amendment. But the proposed BIS rules suggest that information posted on the internet would not be subject to EAR controls. The rules state that *“the EAR includes criteria in part 734 that would exclude certain information and software from control. For example, if a gun manufacturer posts a firearm’s operation and maintenance manual on the internet, making it publicly available to anyone interested in accessing it and without restrictions on further dissemination (i.e., unlimited distribution), the operation and maintenance information included in that published operation and maintenance manual would no longer be “subject to the EAR.” (See §§ 734.3(b) and 734.7(a).)”* If information published online would not be subject to the EAR, then 3D plans for guns published online would be outside the scope of export controls under the proposed rules. We are greatly concerned about the loss of controls on 3D gun-printing plans, which has increasingly assisted bad actors in enhancing their capabilities to inflict atrocities around the world.

## **Recommendations**

We recommend that the final rule expand the definition of “technology” to capture defense-service type activities that would otherwise be left unregulated. More specifically, it will be critical to ensure that a final rule requires U.S. companies to request a license to furnish training on the use of firearms to foreign security forces, support for design and development assistance, testing, and production assistance on firearms and ammunition. To ensure that criminal organizations do not have the capability to easily build firearms, it will be critical that design and development information related to semi-automatic firearms, including 3D printing plans for guns, be considered controlled “technology” under the EAR.

## **Registration Requirement for Manufacturers**

### **Proposed Change**

---

<sup>16</sup> <https://archives.fbi.gov/archives/charlotte/press-releases/2012/academi-blackwater-charged-and-enters-deferred-prosecution-agreement>

The transfer of certain Category I-III items from the USML to the CCL means that manufacturers and exporters, as well as providers of defense services, of those items will no longer be required to register with the State Department's Directorate of Defense Trade Controls (DDTC) or with any U.S. government entity before engaging in manufacturing or exporting certain firearms, ammunition, and related parts and components. In other words, exporters and manufactures will not longer be subject to the U.S. government requirement under 22 C.F.R. 122.1, which states that *"any person who engages in the United States in the business of manufacturing or exporting or temporarily importing defense articles, or furnishing defense services, is required to register with the DDTC. A manufacturer who does not engage in exporting must nevertheless register."*

## **Main Concerns**

The State Department requirement for companies and individuals to register before they engage in the manufacturing or exporting is an important tool for the U.S. government to better understand the nature of the firearms industry, including who owns and controls key items and technology of significant military value. It provides the U.S. government with valuable data on manufacturers, government contractors, and importers. While some data on exporters will still be available through Commerce Department required export licenses, not all U.S. manufacturers regularly export or are required to submit a license for export. This loss of documented evidence on firearms manufacturing could severely hamper U.S. law enforcement investigations and the prosecution of arms dealers or others found in violation of AECA.

***New Types of Manufacturing:*** In 2016, U.S. registration for firearms manufacturing activities was deemed so important that DDTC issued specific guidance providing that the below broad range of activities constitute "manufacturing" and thus require registration. The below activities were likely added because of concerns about illicit firearms trafficking and an inability to identify some new or uncommon types of manufacturing. However, this new guidance will not apply to Category I-III items moving to the CCL.

- a) Use of any special tooling or equipment upgrading in order to improve the capability of assembled or repaired firearms;
- b) Modifications to a firearm that change round capacity;
- c) The production of firearm parts (including, but not limited to, barrels, stocks, cylinders, breech mechanisms, triggers, silencers, or suppressors);
- d) The systemized production of ammunition, including the automated loading or reloading of ammunition;
- e) The machining or cutting of firearms, e.g., threading of muzzles or muzzle brake installation requiring machining, that results in an enhanced capability;
- f) Rechambering firearms through machining, cutting, or drilling;
- g) Chambering, cutting, or threading barrel blanks; and
- h) Blueprinting firearms by machining the barrel.

***Company Acquisition Data:*** DDTC registrants are required to notify the State Department within five days of the effectuation of a transaction if the registrant is either a target or a buyer in an acquisition. If a foreign buyer is acquiring a DDTC registrant, a notification must be provided to DDTC 60 days prior to the transaction's effectuation. One of the reasons these notifications are critical is to understand who owns and controls manufacturers of items and technology that could be used to harm U.S. foreign policy interests and, in the case of foreign buyers, pre-notification allows the government to take action and ask questions if there are concerns with a non-U.S. company owning a manufacturer or exporter of controlled items.

## **Recommendation**

While some U.S. companies may make the argument that the registration fee (\$2,250 a year for most exporters) is an economic burden, establishing a threshold for annual revenues could easily solve this issue. If a company does not meet this threshold, their registration fee may be waived. If the proposed rules go into effect, we recommend that the U.S. government establish a registration requirement for manufacturers of the items that are transferring from the USML to the CCL, including the 2016 DDTC guidance, in order to provide for the transparency and accountability needed to identify risk and support U.S. law enforcement investigations.

## **Reporting Requirements on Political Contributions and Fees**

### **Proposed Change**

Finally, the transfer of certain Category I, II, and III items from ITAR to EAR control will mean the loss of the reporting requirements outlined in 22 C.F.R. §130. ITAR's Section 130 requires exporters to report payment of certain political contributions, fees, and commissions related to the sale of defense articles and services to the armed forces of a foreign country or international organization to the DDTC. These reporting requirements were implemented to address concerns about the growing use of agents, advisers, and consultants to obtain business in international defense trade.

Section 130.9 mandates that license applicants disclose to the DDTC political contributions in an aggregate of \$5,000 or more and fees or commissions in an aggregate of \$100,000 or more that the applicant or its vendors have paid or agreed to pay related to the sale for which the license is requested. The same disclosure requirements are imposed upon suppliers, which the regulation defines as "any person who enters into a contract with the Department of Defense" for the sale of defense articles or defense services valued in an amount of \$500,000 or more.<sup>17</sup> Section 130.10 requires that applicants and suppliers furnish detailed information related to the sale (such as the total contract price and the name and nationality of each foreign purchaser) and its related political contributions, fees, or commission to the DDTC. Section 130.12 requires vendors to disclose to the applicant or supplier any political contributions, fees, and commissions paid in relation to the sale. Finally, section 130.14 imposes strict recordkeeping

---

<sup>17</sup> See 22 C.F.R. §130.7.

requirements on each applicant, supplier, and vendor, requiring each to maintain records of any information it furnished or obtained in compliance with Section 130 for at least five years following the date of the report submitted to the DDTC. As the proposed rule will move certain Category I, II, and III items from ITAR control, Section 130 disclosures will no longer be required when obtaining licenses to export those items.

## **Main Concerns**

In many countries around the world, corruption is rampant within their arms procurement systems, as foreign officials seek to steal funds from their national budgets for their personal gain. In Nigeria, this type of corruption helped hollow out the military and made it more difficult for them to effectively combat Boko Haram.<sup>18</sup> In response to similar types of concerns, the U.S. Congress adopted the above reporting requirements to help the U.S. government stop bribery and other fraudulent schemes within the international arms trade. However, this is still a challenging task. According to an earlier Commerce Department report, the United States became aware of "significant allegations of bribery by foreign firms in 294 international contract competitions valued at \$145 billion."<sup>19</sup> Under the proposed rule, the Commerce Department would limit its ability to obtain useful information on U.S. defense companies and prosecute bribery.

**Transparency:** Section 130 reporting requirements encourage transparency within international defense trade and provide U.S. law enforcement with a useful tool to stop corrupt arms deals. At the moment, Section 130 disclosures are an important information-gathering tool through which the government gains access to useful data about arms trade transactions. Information such as the identities and countries of foreign purchasers and the recipients of donations to foreign governments and campaigns have political and diplomatic uses that extend beyond the arms industry. The loss of required Section 130 disclosures when obtaining licenses to export USML Category I, II, and III items means that the pool of useful data the government can access will become smaller. Just as the access to this data has benefits beyond the arms industry, the decrease in accessible data will have negative repercussions beyond the arms industry.

**Prosecutions and Compliance Systems:** The requirement that U.S. companies disclose payments made to solicit, promote, or secure the sale of defense articles or services to the armed forces of a foreign country or international organization is an effective anti-bribery and anti-corruption mechanism. The same can be said for the reporting requirements imposed upon suppliers. While U.S. companies may expectedly choose to avoid notifying the U.S. government of fees and contributions that could be considered bribery, U.S. law enforcement have used the provisions to pursue U.S. prosecutions against major defense companies. In 2010, for example, BAE Systems pleaded guilty and paid a \$400 million fine to the United States after being caught in a scandal to cover up, among other items,

---

<sup>18</sup> Transparency International, "Weaponizing Transparency: Defense Procurement Reform as a Counterterrorism Strategy," May 2017, online at [http://ti-defence.org/wp-content/uploads/2017/05/Weaponising\\_Transparency\\_Web.pdf](http://ti-defence.org/wp-content/uploads/2017/05/Weaponising_Transparency_Web.pdf).

<sup>19</sup> Paul Holden, "Indefensible: Seven Myths that Sustain the Global Arms Trade," online at <https://projectindefensible.org/>.

payments made to “marketing agents” to help it secure arms contracts with Saudi Arabia. The company failed to disclose any fees paid to the agents.<sup>20</sup> The requirement is also a useful tool to encourage U.S. companies to have stronger compliance systems to identify and stop corruption.

### **Recommendation**

In order to maintain important transparency and anti-corruption mechanisms on U.S. firearms sales, the U.S. government would benefit by adding a mechanism to the CCL that would retain the reporting requirement of Part 130.

---

<sup>20</sup> U.S. Department of Justice, “BAE Systems PLC Pleads Guilty and Ordered to Pay \$400 Million Criminal Fine,” March 1, 2010, online at <https://www.justice.gov/opa/pr/bae-systems-plc-pleads-guilty-and-ordered-pay-400-million-criminal-fine>.

# PUBLIC SUBMISSION

<b>As of:</b> 7/12/18 10:15 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 12, 2018
<b>Tracking No.</b> 1k2-946j-87x3
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0348

Public Comment 989. Vista Outdoor. Julia Mason. 7-9-18

---

## Submitter Information

**Name:** Vista Outdoor

**Organization:** Vista Outdoor

---

## General Comment

RE: Comments on Proposed Rule RIN 0694-AF47 -- Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Vista Outdoor Inc., (Vista) is a leading global designer, manufacturer and marketer of consumer products in the growing outdoor sports and recreation markets. We serve these markets through our diverse portfolio of well-recognized brands that provide consumers with a range of performance-driven, high-quality and innovative products, including sporting ammunition and firearms, outdoor products, outdoor cooking solutions, outdoor sports optics, hydration systems, golf rangefinders, and accessories. We serve a broad range of end consumers, including outdoor enthusiasts, hunters and recreational shooters, professional athletes, as well as law enforcement and military professionals.

The majority of Vista brands exported that require BIS or DDTC authorizations are: Federal Premium, CCI, Speer ; Firearms: Savage Arms, Bushnell, BLACKHAWK!, Night Optics, all which will be directly impacted by the proposed rules changes. As requested in the proposed rule contained in Federal Register Notice, 83 FR 24166, May 24, 2018, Vista respectfully submits the following comments in the attached file "Comments on proposed rule RIN 0694AF47."

Sincerely,  
Vista Outdoor Inc.

---

## Attachments







July 9, 2018

Steven Clagett  
Office of Nonproliferation and Controls and Treaty Compliance,  
Nuclear and Missile technology Division

Bureau of Industry and Security,  
U.S. Department of Commerce  
14th Street and Pennsylvania Avenue, NW  
Washington, DC 20230

Submitted: via Internet -- Federal eRulemaking, Docket BIS-2017-0004

RE: Comments on Proposed Rule – RIN 0694-AF47 -- Control of Firearms, Guns,  
Ammunition and Related Articles the President Determines No Longer Warrant  
Control Under the United States Munitions List (USML)

Dear Mr. Clagett;

Vista Outdoor Inc., (Vista) is a leading global designer, manufacturer and marketer of consumer products in the growing outdoor sports and recreation markets. We serve these markets through our diverse portfolio of well-recognized brands that provide consumers with a range of performance-driven, high-quality and innovative products, including sporting ammunition and firearms, outdoor products, outdoor cooking solutions, outdoor sports optics, hydration systems, golf rangefinders, and accessories. We serve a broad range of end consumers, including outdoor enthusiasts, hunters and recreational shooters, professional athletes, as well as law enforcement and military professionals.

The majority of Vista brands exported that require BIS or DDTC authorizations are: Federal Premium®, CCI®, Speer ®; Firearms: Savage Arms™, Bushnell®, BLACKHAWK!®, Night Optics®, all which will be directly impacted by the proposed rules changes. As requested in the proposed rule contained in Federal Register Notice, 83 FR 24166, May 24, 2018, Vista respectfully submits the following comments:

### **Specific Comments**

#### **I. ECCN 0A501 – Firearms (except 0A502 shotguns) and related commodities as follows (See List of Items controlled)**

A. Note 1 to 0A501 – Rationalize Controls Over Antique Firearms and Muzzle Loading Black Powder Firearms

The proposed note states, “Antique firearms (i.e. those manufactured before 1890) and reproductions thereof, muzzle loading black powder firearms except those designs based on centerfire weapons of a post 1937 design, BB guns, pellet rifles, paint ball and all other air rifles are EAR99 commodities.”

1. Antique Firearms

The Note defines antique firearms as “those manufactured before 1890 and reproductions thereof.” Under the current ITAR, antique firearms are controlled under USML Category I(a), however license exemption 22 CFR § 123.17(b) allows exports of “firearms covered by Category I(a) if manufactured on or **before 1898**, or replicas.” BIS’s proposed rule will require licensing of various antique rifles that are currently exported under an exemption.

Comment: We request BIS change the date in the definition of antique firearm in Note 1 from 1890 to 1898 to be consistent with the ITAR exemption.

**II. 0A502 Shotguns; complete trigger mechanisms; magazines and magazine extension tubes; complete breech mechanisms; except equipment used exclusively to treat or tranquilize animals, and except arms designed solely for signal, flare, or saluting use.**

A. License Exception LVS

ECCN 0A502 does not include any list-based license exceptions. The export of, for example, 0A501 trigger or magazine would be eligible for License Exception LVS but the export of a 0A502 trigger or magazine would not. Currently the proposed rule would control low-value parts and components in 0A502 that would be eligible for LVS exports under 0A501.

Comment: To provide consistent controls and exceptions for like items please allow License Exception LVS for 0A502 parts and components proposed for 0A501 for the same types of items, such as shotgun trigger mechanisms, magazines, and magazine extensions.

Suggested modifications:

- i. Change the ECCN heading to “Shotguns and related commodities as follows (See List of Items controlled), except equipment used exclusively to treat or tranquilize animals, and except arms designed solely for signal, flare, or saluting use.”
- ii. Include in the List of Items Controlled new subparagraphs to separately list breech mechanisms, and the remaining components (e.g., “including complete trigger mechanisms; magazines and magazine extension tubes”) with a corresponding Reason for Control which allows for use of exception LVS to the same extent as proposed for 0A501.

**III. 0A504 Optical sighting devices for firearms (including shotguns controlled by 0A502); and “components” as follows (see List of Items Controlled)**

A. Make License Exception LVS Available for 0A504.g Items

The proposed 0A504.g (“Lenses, other optical elements and adjustment mechanisms”) does not allow for the use of License Exception LVS.

Comment: to align the availability of the exception for similarly significant items on 0A501, Vista requests that License Exception LVS be available for 0A504.g components (e.g. optical sighting device knobs), which are insignificant relative to the other items in 0A501.

#### IV. 0A505 Ammunition as follows (see List of Items Controlled)

##### A. Remove 0A018 and Transfer Controls to 0A505

As detailed in the background section of the proposed rules, BIS provides that all firearms, ammunition and related commodities will be consolidated into a new 500 or 600 series of entries and other similar items would be consolidated to the same areas on the CCL, in order to easily identify items for the exporter. Retaining 0A018 would be counter intuitive to what the essence and spirit of consolidating the like items to the same area.

Comment: We request that all commercial firearm, ammunition, and related items be in one of the series of new 500 series ECCNs (specifically the 0A505) and not left in the -018 area

##### B. Allow for Use of License Exception LVS

Proposed ECCN 0A505 includes license exception LVS of \$100 for subparagraph .x “parts” and “components.” The LVS exception is limited to \$100 net value per shipment related to the parts and components of ammunition listed on the CCL.

Comment: Vista requests the value of the LVS exception as it related to ammunition parts and components be raised to \$500 to match that allowed for firearm components.

#### V. Part 758 Export Clearance Requirements

##### A. Delete Proposed AES Reporting Requirements

New paragraph 758.1(g)(4) (“Exports of Firearms and Related Items”) states that “For any export of items controlled under ECCNs 0A501.a or .b, or shotguns with a barrel length less than 18 inches controlled under ECCN 0A502, in addition to any other required data for the associated EEI filing, **you must report the manufacturer, model number, caliber and serial number of the exported items.**” The explanation for the change states this is “to expand the data elements required as part of an AES filing.”

While we do understand the concern and requirement to verify firearms are exported under the correct authorization this proposed rule would be an undue burden on Vista and our U.S. industry competitors, there are already numerous mechanisms and assessment programs in place with other regulatory agencies that monitor the export of firearms, a requirement such as this would not be consistent with prior control.

Comment: We strongly request that BIS delete the new requirement for reporting the manufacturer, model number, caliber and serial number of the exported items in the AES system.

## **VI. Recommendation for Effective Date of Final Rule**

Throughout the reform effort and during transitions of items from the USML to the CCL, the final rules for other categories had an effective date of 180 days after publication.

Comment: Vista recommends a 180-day effective date for the final rule.

\*\*\*\*\*

Thank you for the consideration and opportunity to provide comments to the proposed rules. Vista commends the joint effort among the Bureau of Industry and Security, Directorate of Defense Trade Controls, and other reviewing agencies in this endeavor and we look forward to the final rules being released.

Vista would be happy to respond to any questions or concerns, or provide additional information, please contact Julia Mason via phone (571) 343-7005 or via email at [itoshootingsports@vistaoutdoor.com](mailto:itoshootingsports@vistaoutdoor.com).

Sincerely,  
Vista Outdoor Inc.

A handwritten signature in black ink, appearing to read 'Julia Mason', is written over the printed name.

Julia Mason  
Director, International Trade Operations  
Vista Outdoor Inc.

# PUBLIC SUBMISSION

<b>As of:</b> 7/12/18 10:10 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 12, 2018
<b>Tracking No.</b> 1k2-946k-lj8w
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0347

Public Comment 990. Individual. Jeff Abramson. 7-9-18

---

## Submitter Information

**Name:** Jeff Abramson

---

## General Comment

I have worked in the nonprofit sector for more than a decade in efforts to promote more responsible trade in conventional weapons and find these proposed regulatory changes to be irresponsible and dangerous. They continue the wrong-minded approach of the Trump administration to treat weapons as any other trade commodity, threatening to undermine long-term global security and true U.S. national security interests.

Please see full comments in the attached document.

---

## Attachments

ProposedUSMLCatItoIIChanges\_Comments\_Abramson

Comments re: ITAR Amendment - Categories I II, and III; EAR Amendment - RIN 0694-AF47

Jeff Abramson

July 9, 2018

I have worked in the nonprofit sector for more than a decade in efforts to promote more responsible trade in conventional weapons and find these proposed regulatory changes to be irresponsible and dangerous. They continue the wrong-minded approach of the Trump administration to treat weapons as any other trade commodity, threatening to undermine long-term global security and true U.S. national security interests. While my comments below are as an individual concerned U.S. citizen, they are informed by my work as a senior fellow at the Arms Control Association, coordinator of a global network of professionals engaged on these issues --the Forum on the Arms Trade--, and former leader within the international Control Arms campaign that championed the creation and now implementation of the Arms Trade Treaty.

In addition to these comments, I commend to reviewers the comments by experts listed by the Forum on the Arms Trade, including: Colby Goodman, William Hartung, Christina Arabia; Adotei Akwei (on behalf of Amnesty International USA); and John Lindsay-Poland, which delve into many of these points in much greater detail.

Specific concerns include:

#### **Loss of Congressional oversight**

In 2002 Congress amended its notification threshold so that it would be informed of potential commercial sales of firearms under USML category I when they were valued at just \$1 million, as opposed to \$14 million for other major weapons sales. Such notifications have been instrumental in forestalling unwise sales, including last year to Turkey and the Philippines. No similar statutory requirement of congressional notification exists for most arms sales under the CCL, meaning Congress would lose its oversight role on these weapons.

#### **Public reporting should be improved, not weakened**

The public gains some insight into the transfer of weapons via Congressional notifications, and also through the State Department's 655 report and Blue Lantern investigations report. Those reports could provide much more detail, such as the number of specific weapons involved and other data, rather than broad categorical details (655 report). Commerce reporting provides even less data, with similar reports covering around 20 countries per year. We deserve better transparency, not worse. If this transfer of authority moves forward, the Commerce department should be required to improve its reporting.

#### **Non-sensical to no longer consider these military weapons/defense articles**

The transfer of regulatory authority to the Commerce Department is claimed to be wise because these weapons no longer "provide the United States with a critical military or intelligence advantage or, in the case of weapons, are inherently for military end use," and further because many "are widely available in retail outlets in the United States and abroad."

Applying this general approach--taken from the larger export reform initiation--falls apart when we are looking at firearms and their ammunition. These weapons are and should be controlled because a

significant amount of violence that occurs, including against U.S. military and law enforcement personnel, is inflicted by small arms. Research indicates that the types of weapons being transferred to Commerce control—AR-15s and AK-47 style assault rifles and their ammunition—are “weapons of choice” of drug trafficking organizations in Mexico and other Latin American countries. Many can also be easily converted to fully automatic weapons, which will remain under USML control. U.S. military members often operate their fully-automatic-capable weapons in a semi-automatic or less-than-automatic mode. Plus, many sniper rifles to be moved to Commerce control are in U.S. military use.

In addition, in many of the countries where these weapons are likely to be marketed, they are considered military weapons and tightly controlled. As currently proposed, they would also remain on the US Munitions Import List (USMIL), which is proper. Why they would therefore not remain on a similar export list is illogical.

Being commercially available in the United States is not a good indicator of whether these weapons merit the oversight of the State Department, which is better tasked with weighing non-commercial concerns. Nor is it proper to consider these weapons somehow safer than others on the USML.

### **Upsetting norms on human rights as relates to the arms trade**

The United States maintains strong laws against the provision of arms where certain human rights abuses are of concern (even if we do not always live up to those laws). Some of those laws may not apply to items in the 500 series. And although the State Department will be consulted in licensing decisions, it is difficult to see how this new approach would strengthen the ability of DRL and others concerned about human rights to forcefully insert human rights into arms sales decisions.

At a time where the global community must make the arms trade more responsible, these proposed changes would make its largest arms dealer, the United States, appear less responsible and less concerned about the human rights implications of the arms trade.

### **Making 3-D printing easier is dangerous**

It is unfathomable how allowing untraceable 3-D printing of firearms serves U.S.-recognized goals to combat illicit trafficking of firearms. Our country has agreed to support the Program of Action (PoA) on small arms and light weapons and the International Tracing Instrument (ITI), has signed accords on arms transfers and tracing in the Americas, and argued for why these efforts are so important. The United States also is the world’s largest donor, as I understand it, to helping countries build their ability to trace weapons, secure weapons stockpiles, and to destroy those stocks when warranted. Yet, this transfer of authority to Commerce appears to open the door to unfettered 3D printing, which threatens to undermine nearly all those efforts.

### **Overall**

At a fundamental level, U.S. arms are not like any other commodity and should not be treated as such. These are first and foremost killing machines. The over-emphasis on economic security threatens to jeopardize higher priorities, including peace and security concerns. If more weapons flow to countries with poor human rights records, norms around responsible weapons use and transfer will be harder to build and uphold.



This analysis is built upon documents and comments currently available at <https://www.forumarmstrade.org/catitooiii.html>

Including:

- "[Proposed Firearms Export Changes: Key Challenges for U.S. Oversight](#)," (see also attached 14 page document), Center for International Policy, William Hartung, Colby Goodman, Christina Arabia
- Arguments against retail availability criterion ([pdf](#)), public comment by John Lindsay-Poland, Global Exchange
- "[Examples of Firearms Transferred to Commerce Under New Export Rules](#) (pdf)," Violence Policy Center, contact Kristen Rand
- "[Business with A Bang:How the Proposal to Loosen Arms Export Regulations Threatens Human Rights](#)," Nate Smith, Amnesty USA, June 15, 2018 and [Public Comment 41](#) from Adotei Akwei ([pdf](#))
- "[Trump Favors Arms Industry in Effort to Loosen Export Controls](#)," Jeff Abramson, Issue Brief, Arms Control Association, June 7, 2018.

# PUBLIC SUBMISSION

<b>As of:</b> 7/12/18 10:04 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 12, 2018
<b>Tracking No.</b> 1k2-946l-cmq2
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0346

Public Comment 991. Safari Club International. Anna Seidman. 7-9-18

---

## Submitter Information

**Name:** Anna Seidman

**Organization:** Safari Club International

---

## General Comment

See attached file(s)

---

## Attachments

07 08 2018 - Safari Club International Comments on RIN 1400 AE30 and RIN 0694-AF47



July 9, 2018

Via <http://www.regulations.gov>

Office of Defense Trade Controls Policy  
Department of State  
[DDTCPublicComments@state.gov](mailto:DDTCPublicComments@state.gov)

Regulatory Policy Division,  
Bureau of Industry and Security,  
U.S. Department of Commerce,  
Room 2099B,  
14th Street and Pennsylvania Avenue NW,  
Washington, DC 20230.

**Re: Safari Club International Comments on Proposed Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories, I, II and III, Docket RIN 1400 AE30, DOS-2017-0046; and Proposed Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML), RIN 0694-AF47, Docket No. 111227796-5786-01.**

Dear Sirs:

Safari Club International (SCI) submits these comments in support of the U.S. Department of State's proposed amendments to the International Traffic in Arms Regulations (ITAR) to revise Categories I, II, and III of the U.S. Munitions List (USML) to describe more precisely the articles warranting export and temporary import control on the USML. SCI also supports the Department of Commerce, Bureau of Industry and Security's proposed determination that these items no longer warrant control under the U.S. Munitions List (collectively referred to as "proposed regulations").

SCI does not support the proposed regulations' finalization and implementation of a modified procedure for the temporary export of firearms and ammunition by individuals who wish to travel outside the U.S. for recreational hunting and shooting purposes. The procedure requires travelers to use the Automated Export System (AES) to register their personal firearms and ammunition. This is an inappropriate and unworkable system for the individual who wishes to temporarily export his/her firearms. As an alternative, SCI requests that the proposed regulations be modified so that they delete the AES registration requirement and formalize and codify the Form 4457 process to ensure its consistency and use by all Customs and Border Protection (CBP) officials.

## **Safari Club International**

Safari Club International, a nonprofit IRC § 501(c)(4) corporation, has approximately 50,000 members worldwide, many of whom are U.S. residents who travel with their firearms for hunting and recreational shooting around the world. They are individuals, not businesses, who seek only to bring their own property with them when they travel and return to the U.S. with that same property. Their activities are legal and are regulated by the countries they visit to hunt and shoot.

## **The Origin of the AES Registration Requirement**

The export of firearms is controlled under the ITAR, which is administered by the U.S. Department of State, Directorate of Defense Trade Controls (DDTC). ITAR regulations have historically included an exemption under 22 CFR §123.17(c) allowing U.S. persons to temporarily export without a license up to three nonautomatic firearms and not more than 1,000 cartridges. This exemption is widely used by hunters and other sportsmen, who travel overseas with firearms to be used for sporting and other legal purposes. To use the exemption, the U.S. person must declare the firearms and/or ammunition to CBP, carry the firearms as part of their baggage, and not transfer ownership while abroad.

In 2011, DDTC published a Federal Register notice of proposed rulemaking that principally revised the exemption related to personal protective equipment, but also included a requirement that those traveling with firearms register through the Automated Export System (AES): “The person. . . presents the Internal Transaction Number from submission of the Electronic Export Information in the Automated Export System per §123.22 of this subchapter....” 76 Fed. Reg. 16353, 163534 (Mar. 23, 2011).

The system required those registering to provide an Employer Identification Number (EIN), available only to commercial enterprises. The registration system also involved procedures far too complicated and burdensome than necessary for individuals seeking only to travel with their personal equipment. Because the registration system imposed registration obligations that would have forced hunters and shooters to make false representations to the Internal Revenue Service, jeopardized their ability to obtain permits to import the wildlife they successfully hunted, and imposed burdensome obligations unnecessary and inappropriate for non-commercial importers, CBP agreed to postpone the implementation of the registration requirements and to continue the use of Form 4457 as the mechanism to facilitate temporary firearms export. Even that solution presented problems. Due to the inconsistencies in the way that CBP personnel issued the forms, U.S. residents have encountered difficulties in taking their firearms to foreign countries (e.g. South Africa) that attribute much greater significance to Form 4457 than does the U.S.

## **Collection of Data Through AES Registration is Inappropriate**

Without good reason, the proposed regulations would reactive the AES registration requirement for individuals seeking to temporarily export their firearms and ammunition.

Consistent with the ITAR requirements previously applicable to temporary exports of the firearms and associated ammunition covered by this rule, [Bureau

of Industry and Security (“BIS“)] is proposing to modify § 758.1 of the EAR to make clear that exporters would continue to be required to file Electronic Export Enforcement (EEI) to the Automated Export System (AES) for transactions involving such firearms and associated ammunition that are otherwise authorized pursuant to License Exception BAG.

83 Fed. Reg. 24174. The purpose of the registration system is not to facilitate the temporary export and reimport of firearms and ammunition. According to CBP, the collection of export data through the registration is designed to help with the “compilation of the U.S. position on merchandise trade” and is an “essential component of the monthly totals provided in the U.S. International Trade in Goods and Services (FT900) press release, a principal economic indicator and a primary component of the Gross Domestic Product.” <https://www.census.gov/foreign-trade/aes/aesdirect/AESDirect-User-Guide.pdf>

The government has no need to collect this data. The data, provided by individuals who wish to temporarily export and then re-import the same personally owned equipment, has nothing to do with the “U.S. position on merchandise trade” or the “Gross Domestic Product.”

The only purpose for the collection of data from individual hunters who travel with their firearms is likely to enable the government to maintain records on these individuals and their legal activities abroad. In the proposed regulations, the BIS acknowledges that the intention of the AES filing system was to “track such temporary exports of personally-owned firearms and ammunition.” SCI strongly opposes this attempt to “follow” and retain records of the individuals who travel with their firearms for hunting purposes. These individuals have taken no actions meriting the government’s desire or need to collect and maintain data on their activities. The government should remove the requirement to collect such data.

### **The Proposed Regulations Recognize Flaws in the Registration System**

The proposed regulations provide the public with the opportunity to comment on whether CBP has been able to remedy the problems identified when CBP first attempted to activate and implement the new requirement. The drafters also condition the reactivation of the AES registration requirement on CBP’s success in remedying the problems that plagued the introduction:

Whether and how BIS includes this requirement in a final rule would be based on whether CBP is able to update its processes, and other agencies as needed, to allow for individuals to easily file EEI in AES by the time a final rule is published. If CBP is not able to do so, then the final rule may direct exporters to continue to use CBP’s existing process, which is the use of the CBP Certification of Registration Form 4457, until a workable solution is developed or CBP suggests an alternative simplified solution for gathering such information for temporary exports of personally-owned firearms and ammunition. BIS will also take into consideration any public comments submitted on this aspect of the proposed rule regarding imposing an EEI filing requirement in AES, as well as

comments on the current practice of using the CBP Form 4457, as well as any other suggestions on alternative approaches for tracking such information.

83 Fed. Reg. 24174. AES registration should not be required as CBP has not remedied the problems that plagued the initial attempted implementation of the system.

### **The AES Registration System Requires Individuals to Provide False Information to the Internal Revenue Service**

The AES registration system continues to require persons temporarily exporting firearms or ammunition to present “the Internal Transaction Number from submission of the Electronic Export Information in the Automated Export System.” The AES system requires an EIN before a user can submit any data. The Census Bureau administers the AES system, and their website still includes the following FAQ:

**The Internal Revenue Service (IRS) site states that an Employer Identification Number (EIN) is for use in connection with business activity only. It further states, do not use your EIN in place of a Social Security Number. The information provided by the Census Bureau and the IRS is conflicting.**

The IRS publication titled “Understanding Your EIN” which is located on their webpage (<http://www.irs.gov/pub/irs-pdf/p1635.pdf> [external link]) states that “...Employer Identification Number (EIN) is for use in connection with business activity only, do not use your EIN in place of a Social Security Number”.... However, for the purposes of registering or filing in the AES you can and should use your EIN. While it is not specifically stated, an EIN can be obtained for government reporting purposes when a person does not own a business.”

<https://www.census.gov/foreign-trade/regulations/ssnfaqs.html>. The Census Bureau site expressly tells individual exporters to ignore the IRS’s instructions and to misrepresent themselves as businesses, in order to obtain an EIN. The IRS site contains no instructions providing such an exception.

The Census guidelines instruct individuals to select “Sole Proprietorship” as the “type of legal structure applying for an EIN,” which is explained by IRS as: “sole proprietor includes individuals who are in business for themselves, or household employers.” The individual is further required to select “started a new business” as the reason why the sole proprietor is requesting an EIN. For an individual seeking to travel overseas with their firearms, this information is confusing, false and entered only to obtain the EIN.

As nothing has changed to remedy this problem since the AES registration requirement was originally imposed, the regulations should not include this requirement.

### **The AES Registration System is Designed for Commercial Operations and Is Overly Complicated for the Individual Exporter**

Despite the years that have passed since CBP's attempt to require individuals to register through the AES system for the temporary export of their firearms, the agency has not made meaningful progress in reducing the overly complicated process for registration. The system is designed for businesses whose repeated use of the system merits the time and patience required for registration. The online AES Direct Users' Guide (which contains no reference to individuals, temporary export, or firearms) is a 39-page manual that an individual would be required to learn in order to register with the system. The registration mechanism is unnecessarily burdensome and complicated for the private individual who does not wish to participate in commercial trade but merely wants to temporarily take his own firearm with him outside the U.S. for a recreational hunt or shoot.

### **Individuals Identifying Themselves as a Commercial Enterprise Could Jeopardize Their Ability to Import Legally Hunted Animals**

The requirement that individual hunters obtain an EIN, recognized by the IRS for business purposes only, could potentially jeopardize the ability of hunters to import some sport-hunted trophies from abroad. The U.S. Fish and Wildlife Service (FWS) prohibits the importation of many sport-hunted species for commercial purposes. A hunter who registers as a business for the purpose of leaving the country and exporting the firearms he plans to use to hunt outside the United States, risks the FWS prohibiting the hunter from importing his trophies and otherwise penalizing the hunter.

### **The AES Registration System Does Not Replace the Use of Form 4457**

As mentioned above, the proposed regulations did not intend the AES registration requirement to replace CBP Form 4457 for the temporary export and reimport of personally owned firearms. Even with the AES registration requirement, temporary exporters of firearms and ammunition will still need to obtain and complete Form 4457 and display it upon re-entry into the U.S. to prove that they did not acquire the firearms abroad. Because (1) the AES registration requirement and its purpose of tracking the activities of law-abiding hunters and recreational shooters are neither necessary nor appropriate for the temporary export activities of hunters and shooters, and (2) these individuals will continue to need to obtain and display Form 4457, the logical solution would be to abandon the AES registration requirement, retain the Form 4457 practice, and improve the mechanisms for issuing the latter.

### **Future Use of Form 4457 Needs to Reflect the Greater Significance of the Document Outside the U.S.**

While CBP has used Form 4457 as primarily a mechanism for determining whether the firearm being imported into the U.S. is the same property the individual exported when he or she left the country, other governments attribute greater significance to the document.

South Africa, for example, treats the form as a pseudo license of a U.S. resident traveling with a firearm. South African police have conditioned import of firearms into their country on the U.S. resident's possession of what South Africa considers to be a valid Form 4457. In 2017, this led

to problems for hunters traveling to South Africa when the CBP began issuing Form 4457s with already expired expiration dates. Although CBP explained that the agency attributes little meaning to the form's expiration date, South African officials considered the forms expired and prohibited hunters from entering the country with their firearms due to the apparent expired appearance of the forms.

The problem was exacerbated by different offices of CBP issuing different versions of the form, which also did not match the form available from CBP's website. After representatives of SCI and other organizations engaged in numerous discussions on the issue with CBP personnel, CBP adopted a temporary solution of issuing new forms with a future expiration date. CBP needs to adopt a more permanent solution that addresses the significance of the form in other countries, such as issuing forms without any expiration date.

### **SCI's Recommended Resolution and Revision of the Proposed Rules**

SCI recommends that the drafters delete the AES registration requirement entirely for individuals and make it clear that registration is not required for those who wish to temporarily export their firearms from the United States. No tracking of the legal activities of these hunters and shooters should be conducted and no compilation of data about these individuals should be permitted. Instead, the drafters should formally codify the use of Form 4457 for individuals and should identify a single consistent standard for the form that contains no date that could be interpreted or misinterpreted by anyone as an expiration date.

Thank you for the opportunity to comment on these proposed regulations, and in particular to advocate for the removal of a process that should not be applied to individuals who wish only to temporarily export their firearms in order to engage in legal activities outside of the United States. If you have any questions or need anything further, please contact Anna Seidman, Director of Legal Advocacy Resources and International Affairs, [aseidman@safariclub.org](mailto:aseidman@safariclub.org).

Sincerely,



Paul Babaz  
President, Safari Club International



# PUBLIC SUBMISSION

**As of:** 7/17/18 3:33 PM  
**Received:** July 09, 2018  
**Status:** Posted  
**Posted:** July 12, 2018  
**Tracking No.** 1k2-9461-legk  
**Comments Due:** July 09, 2018  
**Submission Type:** Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0345

Public Comment 992. Giffords Law Center to Prevent Gun Violence. Lindsay Nichols. 7-9-18

---

## Submitter Information

**Name:** Lindsay Nichols

**Organization:** Giffords Law Center to Prevent Gun Violence

---

## General Comment

Please see attached

---

## Attachments

Giffords Exports Letter 7-9-18

July 9, 2018

**SUBMITTED VIA FEDERAL E-RULEMAKING PORTAL**

Director of Defense Trade Controls  
U.S. Department of State  
[DDTCPublicComments@state.gov](mailto:DDTCPublicComments@state.gov)

AND  
Regulatory Policy Division,  
Bureau of Industry and Security,  
U.S. Department of Commerce, Room 2099B  
14th Street and Pennsylvania Avenue NW  
Washington, DC 20230

RE: Docket Nos. DOS-2017-0046, BIS-2017-0004

**ITAR Amendment -- Categories I, II, and III and Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control under the United States Munitions List (USML)**

This comment is submitted on behalf of Giffords and Giffords Law Center (“Giffords”) in response to the Proposed Rules published by the Departments of State and Commerce on May 24, 2018 regarding the classification and administration of exports of certain firearms and ammunition. The Proposed Rules are complex and would represent a dramatic change in the regulatory structure governing firearm exports. We are concerned that the Proposed Rules may not adequately address our national security, foreign policy, international crime, or terrorism threats. In sum, we are concerned about potential loss of life. We also believe the Proposed Rules do not adequately address the need for transparency so Congress and the public may understand the impact of these Rules on potential weapons exports.

Giffords is committed to advancing common-sense change that makes communities safer from gun violence. Operating out of offices in San Francisco, New York, and Washington, DC, our staff partners with lawmakers and advocates at the federal, state, and local levels to craft and enact lifesaving gun safety laws, participate in critical gun-violence-prevention litigation, and educate the public on the proven solutions that reduce gun violence.

## THE PROPOSED RULES APPEAR DRIVEN BY THE INTERESTS OF THE GUN INDUSTRY

Even the National Rifle Association (NRA) admits that the Proposed Rules were drafted with “the goal of increasing U.S. manufacturers’ and businesses’ worldwide competitiveness.” These Rules are “designed to enhance the competitiveness of American companies in the firearms and ammunition sectors,” allowing firearms and ammunition “to be subject to a more business-friendly regulatory climate.”<sup>1</sup>

We are concerned that the Proposed Rules elevate the desire of American gun manufacturers to compete with international arms dealers over the danger that exported firearms will contribute to international gun crime and violence. The United States must not prioritize gun industry profits over human lives.

## THE PROPOSED RULES WILL DRAMATICALLY CHANGE THE LAW, RISKING NEW LOOPHOLES

We are concerned that the Proposed Rules, by shifting firearms and ammunition from the United States Munitions List (USML) to the Commerce Control List (CCL), would weaken oversight over exports of these items. As even the NRA has acknowledged, “items on the USML controlled under ITAR are generally treated more strictly,” whereas regulation under the CCL “is more flexible.” The NRA has also admitted that license applications for items on the USML are subject to “more stringent vetting” than items on the CCL.<sup>2</sup>

The Departments of State and Commerce, in drafting the Proposed Rules, have made some efforts to ensure that exports of firearms and ammunition will still be subject to oversight. But the dramatic nature of the proposed changes, and the complexity of the Proposed Rules raise serious concerns about hidden loopholes. Some areas of potential concern include:

- Congressional notification and the methods for Congress to disapprove of proposed firearm exports;
- The extent to which the Commerce Department monitors the end-users of its products; and the extent to which Congress and the public have access to information about the results of this monitoring;
- The online posting of designs for the production of firearms, and their use in the 3D printing of untraceable firearms;
- Firearms training provided to foreign security forces;
- The reporting of political contributions by gun exporters and related entities;
- The Commerce Department’s bandwidth to properly oversee these exports; and
- The regulation of brokers who act as middlemen in firearms transactions, and the threat that firearms will be diverted by these middlemen to violent ends.

---

<sup>1</sup> National Rifle Association, *Trump Administration’s Proposed Rulemakings a Win-Win for America’s Firearms Industry*, National Security, <https://www.nraila.org/articles/20180525/trump-administration-s-proposed-rulemakings-a-win-win-for-americas-firearms-industry-national-security>

<sup>2</sup> Ibid.

According to the State Department's Proposed Rules, "The Department of Commerce estimates that 4,000 of the 10,000 licenses that were required by the [State] Department will be eligible for license exceptions or otherwise not require a separate license under the EAR." This statement seems to directly contradict the statement in the Commerce Department's Proposed Rules that "BIS would require licenses to export, or reexport to any country a firearm or other weapon currently on the USML that would be added to the CCL by the proposed rule." The Commerce Department later clarifies, "The other 4,000 applicants may use license exceptions under the EAR or the "no license required" designation, so these applicants would not be required to submit license applications under the EAR." While we recognize that other forms of oversight may be available, this dramatic difference in the number of licenses raises our concern.

We are also particularly concerned that these changes will result in an increase in the number of untraceable firearms in circulation. As 3D printing technology becomes more widely available, the likelihood that it may be used to construct operable firearms that are exempt from serialization requirements increases. Under current law, the proliferation of 3D printed firearms is held in check by the Fifth Circuit's decision in *Defense Distributed v. U.S. Dep't of State*,<sup>3</sup> which upheld the State Department's decision that the posting of online data for the 3D printing of firearms fell within the USML. The Proposed Rules would throw that determination into question.

Inadequate gun safety laws cost human lives. When gun purchasers are not properly vetted and laws against gun trafficking are not properly enforced, guns often fall into the wrong hands and are used to perpetrate horrendous crimes and violence. The U.S. experiences this loss of life on a daily basis, with over 90 people killed each day. We do not wish to see a similar effect on an international level from the weakening of our laws regarding gun exports.

### **THIS CHANGE LACKS SUFFICIENT CONGRESSIONAL NOTIFICATION REQUIREMENTS**

We have not seen anything in the Proposed Rules that would continue Congressional notification requirements for any of the Category I firearms that are being moved to the CCL. There are several types of sales controlled under the Arms Export Control Act that require Congressional notification. Under current law, a certification must be provided to Congress prior to the granting of any license or other approval for transactions involving the export of a firearm controlled under Category I of the USML in an amount of \$1 million or more.<sup>4</sup> Congress then has the ability to enact a joint resolution prohibiting the export, which would prevent the State Department from licensing the sale. Congress generally is given 15 days or 30 days to review the transaction before a license can be granted, depending on the items being exported and the

---

<sup>3</sup> 838 F.3d 451 (5th Cir. 2016).

<sup>4</sup> See 22 U.S.C. § 2776, 22 C.F.R. 123.15(a)(3).

country to which it is being exported. While there are Congressional notification requirements for certain products that are controlled under the CCL, it seems that such notification requirements would not be as broad that as under the USML.

Congress should continue to receive advance notification of transactions involving firearms and to have the opportunity to prohibit these exports when appropriate. The Proposed Rules should be strengthened to protect Congress's authority in this area.

### **THE CHANGE MAY RESULT IN LESS TRANSPARENT END-USE MONITORING**

We are concerned about a possible reduction in the monitoring of the end-users of exported firearms and publicly available information about this monitoring. The State Department currently monitors the end-users of firearm exports through its Blue Lantern program. Public reporting of Blue Lantern information is mandatory<sup>5</sup> and there are readily available statistics about the results. While the Commerce Department also conducts end use monitoring, there does not appear to be as fulsome a public reporting requirement for these end use checks as under the Blue Lantern program.

The Proposed Rules do not discuss end use monitoring of the items being moved to the CCL. It is reasonable to assume that these items will fall under the general Bureau of Industry and Security end use check program. This end use check program is not as well-publicized or as formal as the Blue Lantern program, and only a very small percentage of exported items are reviewed. If the Proposed Rules move forward, this program must be strengthened to address the need to monitor the end-users of exported firearms and provide the public with information about the results.

### **THIS CHANGE IGNORES THE MILITARY NATURE OF MANY FIREARMS**

The Proposed Rules are based on an assumption that automatic firearms are designed for and used by the military, and semiautomatic firearms are not "inherently military." This is inaccurate. Consequently, we question the President's determination that semiautomatic firearms and ammunition no longer warrant control under the USML.

In fact, members of the U.S. armed forces routinely use firearms in semiautomatic mode in combat conditions, and the designs of many semiautomatic firearms are inherently military. Assault rifles like the AR-15 were originally designed for military use. Earlier models included a selective fire option that allowed service members to switch easily between automatic and semiautomatic modes. The military included the option to fire in semiautomatic mode because military combat sometimes requires use of a firearm in

---

<sup>5</sup> 22 U.S.C. §§ 2785, 2394, 2394-1a

semiautomatic mode. Shooting in semiautomatic mode is more accurate and hence more lethal.<sup>6</sup> In fact, some members of the military use the semiautomatic mode exclusively.

The fact that some gun enthusiasts “enjoy” shooting these weapons and have labeled this activity “modern sport shooting” or “tactical shooting” does not change the design or purpose of these firearms or the danger they pose in civilian hands. The horrendous rise in mass shootings our country has suffered and the frequency with which these firearms are used in these shootings testify to this danger.

Military-style semiautomatic firearms were used to perpetrate the tragedies that occurred in an elementary school in Newtown, Connecticut, at a music festival in Las Vegas, Nevada, at a workplace in San Bernardino, California, in a movie theatre in Aurora, Colorado, and at a high school in Parkland, Florida, among others. Because of the dangerous nature of these weapons, D.C. and seven states, including the populous states of California and New York, ban them.<sup>7</sup> Because of the military nature and serious lethality of these weapons; they belong on the USML.

## **THERE ARE ALTERNATIVES TO THE PROPOSED RULES THAT HAVE NOT BEEN EXPLORED**

The real concern that seems to be driving this significant change in the way the U.S. government regulates firearms exports is that firearms and ammunition manufacturers are currently required to register with the State Department and pay a registration fee. According to the NRA, “Any business that manufactures an item on the USML, or even just a part or component of such an item, also has to register with the State Department and pay an annual fee, which is currently set at \$2,250. This registration is required even if the manufacturer has no intent to ever export the items. ... Manufacturers of items on the CCL, or their parts or components, do not have to pay an annual registration fee to the Commerce Department.”<sup>8</sup>

The registration fee appears to be the NRA’s primary concern with the current system for regulating the export of firearms and ammunition. The simple solution to this problem might be to waive the fee for manufacturers who do not, in reality, export these items. Waiving the fee would relieve industry of this “burden” without undoing the important policy choices made by the State Department in the regulation of these exports or requiring the Commerce Department to “reinvent the wheel” with respect to these regulations. While we would not necessarily support this proposal (it might shift the costs of manufacturer

---

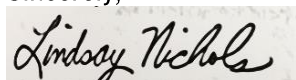
<sup>6</sup>With AR-15s, Mass Shooters Attack With the Rifle Firepower Typically Used by Infantry Troops, NY Times, Feb. 28, 2018, <https://www.nytimes.com/interactive/2018/02/28/us/ar-15-rifle-mass-shootings.html>.

<sup>7</sup> See Giffords Law Center to Prevent Gun Violence, *Assault Weapons* at <http://lawcenter.giffords.org/gun-laws/policy-areas/hardware-ammunition/assault-weapons/>.

<sup>8</sup> National Rifle Association, *supra*.

registration to the taxpayers), we urge the Administration to carefully and thoroughly consider other alternatives to the Proposed Rules.

Sincerely,

A handwritten signature in black ink that reads "Lindsay Nichols". The signature is written in a cursive, flowing style.

Lindsay Nichols  
Giffords Federal Policy Director

---

#### **ABOUT GIFFORDS LAW CENTER**

For nearly 25 years, the legal experts at Giffords Law Center to Prevent Gun Violence have been fighting for a safer America by researching, drafting, and defending the laws, policies, and programs proven to save lives from gun violence.

# PUBLIC SUBMISSION

<b>As of:</b> 7/12/18 9:51 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 12, 2018
<b>Tracking No.</b> 1k2-946m-5enx
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0343

Public Comment 993. Individual. Jeannine Coyne. 7-9-18

---

## Submitter Information

**Name:** jeannine anonymous

---

## General Comment

To Whom It May Concern,

I am writing to strongly oppose Pres. Trump's May 24, 2018 proposal of a new rule that would move the oversight of the export of firearms from the US State Dept to the US Commerce Dept. This is a matter of national security and appropriately is the role of the US State Dept. While this move might raise more money for particular businesses, it would increase the threat of international crime and terrorist crimes. I further oppose the loosening of regulations that keep Americans safe and prevent guns getting into the hands of terrorists.

Respectfully submitted,

Jeannine Coyne



# PUBLIC SUBMISSION

<b>As of:</b> 7/12/18 9:47 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 12, 2018
<b>Tracking No.</b> 1k2-946m-w8wy
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant  
Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant  
Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0341

Public Comment 994. Northrop Grumman. Tom Donovan. 7-9-18

---

## Submitter Information

**Name:** Tom Donovan

---

## General Comment

See attached file(s)

---

## Attachments

RIN 0694-AF47 Comments to DOC for I II III (final)

July 9, 2018

Regulatory Policy Division  
Bureau of Industry and Security  
U.S. Department of Commerce  
Room 2099B, 14th Street and Pennsylvania Avenue, NW  
Washington, DC 20230

ATTN: Mr. Richard E. Ashooh  
Assistant Secretary for Export Administration

SUBJECT: RIN 0694-AF47, Request for Comments Regarding Control of Firearms, Guns, Ammunition and Related Articles the President Determines No longer Warrant Control Under the United States Munitions List.

Dear Mr. Ashooh:

Northrop Grumman Corporation wishes to thank the Department of Commerce (DOC) for the opportunity to submit comments in review of the Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML). In response, we provide the following recommendations:

**General:** We recommend the DOC define "firearm" in harmonization with the USML.

**EAR §740.11 – Governments, international organizations, international inspections, under the Chemical Weapons Convention, and the International Space Station (GOV):**

**Note 2 to paragraph (b)(2)** – the phrase "or other sensitive end-users" is vague and ambiguous. We recommend deletion or enumeration of specific types of entities ineligible for the exception.

**EAR §740.14 – Baggage (BAG):**

**§740.14(c)(1)** – Recommend revising to say "Owned by, or for the exclusive use of, the individuals (or by members of their immediate families) or by crew members of exporting carriers on the dates they depart from the United States;"

- EAR §740.1(c)(1) "Limits on eligibility" currently states that the items must be "owned by" the individuals. The criteria currently in the exemption located in ITAR §123.17(c)(3) is related to the person's "exclusive use," so we recommend revising the language in EAR §740.14(c)(1) so the exception may not be interpreted as being more restrictive than the current ITAR exemption criteria.

**ECCN 0A501:**

To avoid redundancy and duplication, we recommend revising the LVS entry as follows: "LVS: \$500 for 0A501.c, .d, and .x, \$500 for 0A501.e if the ultimate destination is Canada."

**Paragraph 0A501.x:** As currently proposed, paragraph .x would apply to parts, components, accessories, and attachments specifically designed for a commodity classified anywhere on the USML. We recommend revising as follows:

“Parts” and “components” that are “specially designed” for a commodity classified under paragraphs .a through .c of this entry or USML Category I and not elsewhere specified on the USML or CCL.

**ECCN 0A502:** Rather than having the items controlled contained in the ECCN heading, we recommend enumerating separate sub paragraphs for the different reasons for control for size for the different size shotguns. Breaking down to this lower level will allow companies to record much easier the classification in an automated system and apply proper controls without having to continually reference back to technical data or notes.

- .a Shotguns with a barrel length less than 18 inches
- .b Shotguns with a barrel length 18 inches to less than 24 inches
- .c Shotguns with a barrel length greater than or equal to 24 inches
- .d Complete trigger mechanisms; magazines and magazine extension tubes; complete breech mechanisms;

Note: this entry does not control equipment used exclusively to treat or tranquilize animals, and arms designed solely for signal, flare, or saluting use

**ECCN 0A505:**

**Paragraph 0A505.a:** Recommend revising paragraph .a to include ammunition for firearms controlled in USML Category I that may not otherwise be captured, as follows:

Ammunition for firearms controlled by ECCN 0A501 or USML Category I and not enumerated in paragraph .b, .c, or .d of this entry or in USML Category III.

**Paragraph 0A505.d:** Recommend adding clarifying language to this paragraph on whether it also controls “dummy rounds” for medium caliber firearms as it only references “blank ammunition” for small caliber firearms. If this is not intended to control inert dummy ammunition please clarify this category to include that.

**0A505 Related Controls:** Recommend deleting “combat shotguns.” The proposed revision to USML Category I only covers fully automatic shotguns, which is already referenced in the “Related Controls” section.

**ECCN 0B602:** Recommend adding clarifying language on examples of specific tooling that have been included in the transfer from the Department of State to the Department of Commerce or, clarifying this in the final rule. For example, provide clarification by including a note stating that this includes boresights and units made specifically for testing purposes.

**Administrative:** We recommend adopting a delayed effective date of 180 days for rules revising entire categories of the USML and moving items to the CCL.

Should clarification or subsequent technical discussions be necessary, please contact either Steve Headley at [james.headley@ngc.com](mailto:james.headley@ngc.com), (703-280-4806), or myself at [thomas.p.donovan@ngc.com](mailto:thomas.p.donovan@ngc.com) (703-280-4045).

Sincerely,

*Thomas P. Donovan*

Thomas P. Donovan  
Director, Export Management  
Global Trade Management

# PUBLIC SUBMISSION

**As of:** 7/12/18 5:06 PM  
**Received:** July 09, 2018  
**Status:** Posted  
**Posted:** July 12, 2018  
**Tracking No.** 1k2-946q-i32v  
**Comments Due:** July 09, 2018  
**Submission Type:** Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0334

Public Comment 995. Trinity Health. Tonya Wells. 7-9-18

---

## Submitter Information

**Name:** Tonya Wells

**Organization:** Trinity Health

---

## General Comment

See attached

---

## Attachments

TH comments on transfer of firearms from State to Commerce 7-9-18



July 9, 2018

Wilbur Ross  
Secretary  
Regulatory Policy Division  
Bureau of Industry and Security  
U.S. Department of Commerce  
Room 2099B  
1401 Constitution Avenue NW  
Washington, DC 20230

Mike Pompeo  
Secretary  
Office of Defense Trade Controls Policy  
Directorate of Defense Trade Controls  
U.S. Department of State  
2201 C Street NW  
Washington, D.C. 20520

**RE: RIN 0694-AF47 (Commerce) and RIN 1400-AE30 (State)**

Dear Mr. Ross and Mr. Pompeo,

Trinity Health values the opportunity to comment on the proposed rules to address the Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML). Trinity Health is one of the largest multi-institutional Catholic health care delivery systems in the nation, serving diverse communities that include more than 30 million people across 22 states. Trinity Health includes 93 hospitals as well as 109 continuing care locations that include PACE, senior living facilities, and home care and hospice services. We are called by our Catholic faith to preserve the sanctity of life, and are working to reduce violence in our communities and around the world.

The proposed rule referenced above addresses many aspects of firearm regulation, sales and oversight, however Trinity Health is especially concerned about the shift of weapon sale regulation from the State Department to the Commerce Department. Our concern stems from the risk we perceive about how this regulatory change could increase the amount of violence caused by weapons around the world. All forms of firearms are used extensively in criminal violence around the world. We believe the world is better served by their export being handled by the State Department, which is required and organized to consider the probable impacts in importing nations on stability, human security, conflict, and human rights. We have great concern about the proposed transfer of the regulation of gun exportation licensing from the State department to the Commerce Department, whose principle mission is to stimulate trade.

Every day around the world firearms are used to kill a thousand people in acts of organized crime, political violence, terrorism, and human rights violations. The proposed rule would transfer the regulation around the sale of weapons – including AR-15, AK-47 and other military-style assault rifles and their ammunition – to the Commerce Department control. These are among the deadliest personal-use weapons produced in the United States, and it is our understanding that they are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries. We believe that the export of these weapons should be subject to greater regulation, not less.

**We believe that the Department of Commerce is effective at advancing the interests and revenues of private businesses in our country, which contributes to a strong economy. However, we believe that firearms and ammunitions should be viewed as a commodity that should benefit from reduced regulatory oversight. Boosting economic development and competitive advantage at the expense of increased violence including loss of life is**

**unconscionable to us. We strongly urge the Departments of Commerce and State to rescind this proposed rule.**

Thank you for consideration of our comments on this important issue. If you have any questions, please feel free to contact me at [wellstk@trinity-health.org](mailto:wellstk@trinity-health.org) or 734-343-0824.

Sincerely,

A handwritten signature in cursive script that reads "Tonya K. Wells". The signature is written in dark ink and is contained within a rectangular box.

Tonya K. Wells  
Vice President, Public Policy & Federal Advocacy  
Trinity Health

# PUBLIC SUBMISSION

<b>As of:</b> 7/12/18 4:59 PM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 12, 2018
<b>Tracking No.</b> 1k2-946q-6b3d
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> API

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0332

Public Comment 996. F.A.I.R. Trade Group. Johanna Reeves.7-9-18

---

## Submitter Information

**Name:** Anonymous Anonymous

**Address:**

1775 I STREET, NW

SUITE 1150

Washington, DC, 20006

**Email:** [execdir@fairtradegroup.org](mailto:execdir@fairtradegroup.org)

**Phone:** 2025872709

**Organization:** F.A.I.R. TRADE GROUP

---

## General Comment

F.A.I.R. Trade Group respectfully submits the attached comments to RIN 0694-AF47.

---

## Attachments

F.A.I.R. Trade Group Comment to BIS Proposed Rule (RIN 0694-AF47)





# F.A.I.R.

Firearms & Ammunition Import/Export Roundtable

July 9, 2018

Attn: Steven Clagett  
Office of Nonproliferation Controls and Treaty Compliance  
Nuclear and Missile Technology Controls Division

Regulatory Policy Division  
Bureau of Industry and Security  
U.S. Department of Commerce, Room 2099B  
14th Street and Pennsylvania Avenue NW  
Washington, DC 20230.

Subject: RIN 0694-AF47: Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Dear Mr. Clagett:

The purpose of this letter is to provide comments to the proposed rule to amend the *Export Administration Regulations* (EAR) to control those items identified to no longer warrant control under United States Munitions List (USML) Category I - Firearms, Close Assault Weapons and Combat Shotguns; Category II - Guns and Armament; and Category III - Ammunition/Ordnance U.S. Munitions List (USML), which the Bureau of Industry and Security (BIS) published in the *Federal Register* on May 24, 2018 (RIN 0694-AF47; 83 FR 24166).

The F.A.I.R. Trade Group ("F.A.I.R.") is a nonprofit organization dedicated to protecting the interests of the firearms and ammunition import and export communities. F.A.I.R. works with many U.S. government agencies, including the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), the U.S. Department of State, Directorate of Defense Trade Controls (DDTC), and the Department of Commerce, Bureau of Industry and Security (BIS) to provide solutions to the concerns of F.A.I.R. members. Our membership includes importers and exporters of firearms, ammunition, and other defense and dual-use articles who rely on licenses issued by ATF, DDTC, and BIS. Many members also hold Type 07 or Type 10 licenses as manufacturers of firearms. Members provide equipment to domestic law enforcement agencies and the U.S. military who require such items to carry out their public safety and national security missions and sell the articles they import to distributors for general commercial sale. A number of our members also produce firearms and ammunition that are exported to foreign governments for their national defense, consistent with the foreign policy of the United States.

F.A.I.R. welcomes the opportunity to provide comment on the proposed revisions to the EAR to capture those items moving from USML Categories I, II, and III. We applaud the continuing efforts by BIS and DDTC to revise the USML so that its scope is limited to those defense articles that

1775 I STREET, N.W., SUITE 1150, WASHINGTON, DC 20006

---

provide the United States with a critical military or intelligence advantage or are inherently for military end use, and to remove those items that are widely available in retail outlets in the United States and abroad.

Overall, the proposed revisions to the EAR and USML Categories I, II, and III are a positive move to a more rational control of firearms and ammunition, and related parts, components, accessories, and attachments. The transition of certain items to the control of the EAR will serve to right-size license requirements while still maintaining necessary oversight of exports of these items. Additionally, by moving such items to the EAR, many domestic manufacturers who do not conduct exports will be relieved of the significant financial burden of registering under the ITAR.

We provide the following comments for BIS consideration, and are available should BIS or DDTC require additional information or wish to discuss our comments further:

1. **Implementation Period.**

As noted in the proposed rule, BIS has adopted a delayed effective date of 180 days for previous rules revising entire categories of the USML and moving items to the CCL. BIS has requested comments from industry as to whether this implementation period should be applied to the revised Categories I, II, and III.

Recommendation: Split implementation period. We wish to support the continued delayed effective date of 180 days for those industry members who need make changes to IT systems, technology controls plans, and other business processes necessary to implement the rule. However, there will be a number of domestic companies who, for example, do not engage in the business of exporting but engage in certain gunsmith activities or manufacture firearms parts and components for firearms that transition to the EAR who will wish to immediately implement the new rules in order to be relieved of the financial burden of ITAR registration. Therefore, we recommend DDTC allow for a split implementation period to allow those companies whose entire operations transition to the EAR to immediately shift to those controls while allowing those companies whose operations either remain under the ITAR or are now split between the EAR and the ITAR adequate time to make necessary changes to their businesses. There is precedent for a split implementation period as it was done in the *Federal Register* notice implementing of revisions to USML Category XI and corrections to USML Category VIII (See 79 FR 37536).

2. **Transition Firearm Suppressors (Silencers) to the CCL.**

DDTC's proposed rule indicates that "[USML Category I] Paragraph (e) will continue to cover silencers, mufflers, sound suppressors, and specially designed parts and components." The proposed rule further indicates that its objective, after the proposed revisions, is to capture only those articles in USML Categories I, II, and III that provide the United States with a critical military or intelligence advantage, or are inherently for military end use. The items proposed for transition to the EAR do not meet this standard, "including many items which *are widely available in retail outlets in the United States and abroad* [emphasis

added].” Firearm suppressors (silencers) do not provide a critical military or intelligence advantage and are not inherently for military end use. Moreover, the hardware and associated technology is widely available throughout the world. Therefore, based on the litmus test identified in the proposed rule, firearm suppressors (silencers) should not be listed on the USML and should be more appropriately controlled on the CCL in the EAR.

**Recommendation: Remove Firearm suppressors (silencers) from USML Category I(e) and add them as a controlled item under ECCN 0A501.**

3. **Use of “Combat Shotguns”.**

DDTC proposes to revise USML Category I(d) to read as follows: “\*(d) Fully automatic shotguns regardless of gauge.” This proposed revision removes the words “combat shotguns.” While we welcome this change due to the long-standing confusion over this undefined term, the words “combat shogun” are used in the proposed revisions to the EAR, specifically in the Related Controls of proposed ECCN 0A502, which reads: “This entry does not control *combat shotguns* [emphasis added] and fully automatic shotguns. Those shotguns are “subject to the ITAR.” The Related Control to ECCN 0A502 does not go on to provide a definition for “combat shotgun.” The lack of definition and the removal of the reference in the revised USML Category I(d) causes confusion as to what type of firearm is being referenced.

**Recommendation: Remove the reference to “combat shotguns” in ECCN 0A506 and have the Related Control to reflect the language used in the ITAR.** The Related Control would read as follows: “*This entry does not control fully automatic shotguns regardless of gauge. Those shotguns are “subject to the ITAR.”*”

4. **Automated Export System.**

Currently, when exporting firearms, there is no requirement to enter serial numbers of firearms to be exported into the Automated Export System (AES). However, in the BIS proposed rule, there is a proposal to expand the data elements required as part of an AES filing for these items to include serial numbers, make, model and caliber. This requirement is overly burdensome and will exponentially lengthen the time required for filing AES entries. Contrary to the proposed rule, this is not a mere “carrying over” of existing CBP filing requirements for items transferred from the USML to the CCL. The cited reference to information Department of Homeland Security currently collects under OMB Control Number 1651-0010 (CBP Form 4457, Certificate of Registration for Personal Effects Taken Abroad) applies only to personal firearms temporarily exported. However, the proposed rule would apply to all exports of items controlled under ECCN 0A501.a or .b and shotguns with a barrel length less than 18 inches controlled under ECCN 0A502. Consequently, there is a significant change to the information being collected and to the burden hours as a result of this proposed rule.

---

**Recommendation: Remove the expansion of data elements required as part of an AES filing for firearms.** The serial numbers, make, model and caliber of firearms exported, as well as the reference to the export vehicle (e.g., export license, exception) will be maintained by the exporter as part of its acquisition and disposition records required under the Gun Control Act and ATF regulations (27 C.F.R. Pt. 478, Subpart H), which are the same records currently maintained for firearm exports subject to the ITAR. Therefore, there is no loss of oversight or information by transitioning these items to the EAR and thus no need for adding data fields to AES entries. This is not required under the ITAR, and therefore should not now be required under the EAR.

5. **ECCN 0A501**

The BIS proposed rule states in “*Related Controls*” that magazines with a capacity of 50 rounds or greater are “subject to the ITAR.” However, the proposed USML Category I(h)(1) references only magazines and drums with a capacity *greater than* 50 rounds (emphasis added).

**Recommendation: Revise ECCN 0501 “Related Controls” so that the capacity round description is consistently with USML Cat. I(h)(1).**

6. **ECCN 0A501.d.**

This paragraph includes a reference to “complete breech mechanisms” with no further explanation or note to define the terms. It is unclear what would constitute a complete breech mechanism that is distinct from other parts specifically identified in paragraph .c.

**Recommendation: Revise ECCN 0A501 .d to include a definition or explanation of what constitutes a “complete breech mechanism,” and to ensure there is no redundancy with any of the parts referenced in paragraph .c.**

7. **ECCN 0A501.y.**

The proposed rule explains this paragraph would cover such items as scope mounts or accessory rails, iron sights, sling swivels, butt plates, recoil pads, bayonets, and stocks or grips that do not contain any fire control “parts” or “components.” The paragraph indeed lists such items in specifically enumerated subparagraphs .y.1 - .6. Does this mean the .y paragraph controls only those items enumerated in the following subparagraphs .1-.6, or does the umbrella language in .y. serve to capture other parts, components, or attachments that are not specifically enumerated in subparagraphs .y.1 - .6., and not elsewhere specified (such as magazines for less than 16 rounds) ? In other words, does the .y. paragraph itself serve as a catch-all for “parts”, “components”, “accessories” and “attachments”?

**Recommendation: Revise paragraph .y by replacing the period at the end of the paragraph with the phrase “including” or “as follows:” so as to clarify whether .y is limited to the enumerated subparagraphs, or itself is a control paragraph in which**

---

**items can be controlled.** 0A501.y would read as follows: *“Specific ‘parts,’ ‘components,’ ‘accessories’ and ‘attachments’ ‘specially designed’ for a commodity subject to control in this ECCN or common to a defense article in USML Category I and not elsewhere specified in the USML or CCL, as follows [or including]:”*

8. **ECCN 0A502.**

The proposed rule states that this ECCN would control both the shotguns currently on the USML that are to be added to the CCL (barrel length less than 18 inches) and the shotguns and the enumerated “parts” and “components” currently controlled in ECCN 0A984 (barrel length 18 inches or greater). However, the items included in the ECCN header are separated by semicolons and there is no clear statement that the parts and components listed in the header are specific to shotguns. For example, because it is not clear that the enumerated items are specific to shotguns, there could be confusion as to whether 10 round magazines are controlled in ECCN 0A502, ECCN 0A501.y., or would such items fall to EAR99?

**Recommendation: Revise ECCN 0A502 to specify the parts and components enumerated in the ECCN header are SHOTGUN parts and components. We also recommend defining or explaining what constitutes “complete breech mechanism” (see comment for ECCN 0A501.d above).**

9. **ECCN 0A505.**

The proposed rule states that ammunition parts and components would be eligible for license exception LVS with a limit of \$100 net value per shipment. This is a reduction in value compared to the ITAR license exemption currently available under 22 C.F.R. § 123.16(b)(2), which is capped at \$500. It is unclear why the transition to the EAR would result in a reduction in the license exception value limit.

**Recommendation: Revise ECCN 0A505 to increase the value limit for the LVS license exception for ammunition parts and components in paragraph .x to \$500.**

10. **ECCN 0A606.**

The DDTC proposed rule states that “the articles currently controlled in [Category II] paragraph (f), engines for self-propelled guns and howitzers in paragraph (a), will be on the CCL in ECCN 0A606.” However, there are no proposed corresponding changes to ECCN 0A606 in the BIS proposed rule.

**Recommendation: Revise ECCN 0A606 to clearly identify that engines for self-propelled guns and howitzers are controlled therein.**



---

11. **§ 758.10 Entry clearance requirements for temporary imports.**

The proposed rule fails to take into consideration temporary imports by nonresident aliens who are subject to ATF regulations under 27 C.F.R. § 478.115(d). Although the license exception BAG references ATF's jurisdiction with these types of imports, proposed section 758.10 is silent, except for ATF's regulation of *permanent imports* (paragraph (2)).

**Recommendation: Add language to 758.10(a)(2) carving out from the entry clearance requirements for temporary imports by nonresident aliens who temporarily import firearms under the provisions of 27 C.F.R. § 478.115(d).**

12. **§ 762.2 Records to be retained.**

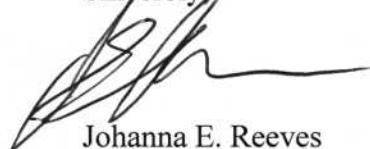
The proposed rule indicates that BIS wishes to make changes to EAR recordkeeping requirements for firearms being moved to the CCL. Specifically, BIS proposes to "add a new paragraph (a)(11) to specify the following information must be kept as an EAR record: Serial number, make, model, and caliber for any firearm controlled in ECCN 0A501.a and for shotguns with barrel length less than 18 inches controlled in 0A502." This additional recordkeeping requirement is unnecessary as it is duplicative of the information that is required to be retained in a company's ATF bound books pursuant to the Gun Control Act and ATF regulations. In other words, the information that BIS seeks to retain is already being maintained by companies under ATF rules and regulations.

**Recommendation: Remove the proposal to add paragraph (a)(11).**

\* \* \* \* \*

F.A.I.R. thanks the Departments of State and Commerce for the opportunity to participate in the regulatory revision process. We hope that our comments assist the government in reducing jurisdictional ambiguities and clarifying the articles that will remain subject to the ITAR. For your information, we also provide a copy of the comments submitted in response to the DDTC proposed rule. Should you have any questions, or require additional information as you review public comments received, please do not hesitate to contact me at 202-587-2709 or [execdir@fairtradegroup.org](mailto:execdir@fairtradegroup.org).

Sincerely,



Johanna E. Reeves  
Executive Director

Enclosure: Comments to DDTC Proposed Rule (RIN 1400-AE30)

# PUBLIC SUBMISSION

<b>As of:</b> 7/12/18 9:18 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 12, 2018
<b>Tracking No.</b> 1k2-946q-ts88
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0331

Public Comment 997. Anonymous. 7-9-18

---

## Submitter Information

**Name:** Anonymous Anonymous

---

## General Comment

I oppose this rule change. I'm very concerned that it will lead to greater accessibility of guns for people who shouldn't have them. No more loss of human life PLEASE!

# PUBLIC SUBMISSION

<b>As of:</b> 7/12/18 9:15 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 12, 2018
<b>Tracking No.</b> 1k2-946r-x68w
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0330

Public Comment 998. Individual. Jennifer Wall. 7-9-18

---

## Submitter Information

**Name:** Jennifer Wall

**Address:**

Maryville, MO,

---

## General Comment

Firearms are a matter of security not of commerce. Let the state department handle matters of security and the sales of firearms rather than transferring that oversight to commerce.

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.



# PUBLIC SUBMISSION

<b>As of:</b> 7/12/18 9:12 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 12, 2018
<b>Tracking No.</b> 1k2-946r-wvlv
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0327

Public Comment 999. Borderview. J VanderHoek.7-9-18

---

## Submitter Information

**Name:** Joel VanderHoek

**Organization:** BORDERVIEW International Firearm Logistics

---

## General Comment

BORDERVIEW appreciates the opportunity to comment on the long-awaited transition of firearms and related items from the jurisdiction of the Department of State to the Department of Commerce. Please see attached for our public submission.

---

## Attachments

Borderview comments on BIS Proposed Rule



July 9, 2018

Submitted at [www.regulations.gov](http://www.regulations.gov) – Docket BIS-2017-0004, and by Email: [steven.clagett@bis.doc.gov](mailto:steven.clagett@bis.doc.gov)

Mr. Clagett et. al.,

BORDERVIEW appreciates the opportunity to comment on the long-awaited transition of firearms and related items from the jurisdiction of the Department of State to the Department of Commerce. We have closely followed the efforts since the early days of the Obama administration to complete this phase of Export Control Reform, and applaud the publishing of these proposed rules.

Broadly speaking, we are very supportive of the proposal and would like to underscore the well-laid justifications made in the 'Background' section of the proposed rule, and furthermore in the related ['Myths vs. Facts' release](#) posted on the Department of Commerce website. BORDERVIEW looks forward your publishing of the Final Rule and completion of these longstanding and bipartisan efforts to simply our nation's export control infrastructure to better control the most military-sensitive items, while maintaining appropriate controls on Dual Use items such as firearms.

After careful review of the Proposed Rules, we offer the following comments and recommendations. In particular, we are most concerned about a number of facets of the proposed rule which add new and additional burden, above and beyond that which has historically been imposed by the ITAR and without proportionate benefit to industry or government. We will identify which comments below are as such.

#### **1. Eliminate Proposed § 758.1(g)(4) – Expanded Data Elements for EEI filing in AES.**

The proposed rules would add required AES data elements of "manufacturer, model number, caliber and serial number" for all exported firearms (to proposed § 758.1(g)(4)). Perhaps most concerning to us as a leading international firearm logistics firm are these burdensome, redundant and unnecessary additional data collection requirements. While it may seem like a relatively simple requirement, we see several problems with imposing this new data collection, and little if any benefit over the existing requirements, particularly with respect to serial number reporting.

First, this adds a new and significant burden over the longstanding requirements, and one which would require exporters to invest significant time and financial resources in re-programming software and AES interfaces, or in repeated and cumbersome manual data entry. Rather than “reducing the procedural burdens and costs of export compliance” as is the stated intent of the proposed rule, this new requirement is one that does just the opposite. As we’ll explain below, we believe this new burden is imposed *without* providing any real improvement in the U.S. Government’s ability “to enforce export controls for firearms appropriately” or “to make better use of its export control resources.”

*surprisingly simple.*<sup>TM</sup>



The explanation given for this new requirement in the Proposed Rule is that the "requirement would ensure law enforcement officials are able to effectively verify that firearms exports are properly authorized and in conformance with all applicable regulations." However, as explained below, we believe this change would affect no substantive improvement in this regard.

#### Serial Number data element in EEI filing in AES

Serial numbers are generally *not* listed on an export license issued by BIS (except in the rare case they are entered by the applicant at the time of application, which is not required and would be unusual). Therefore, the presence of serial numbers in an AES filing would not assist law enforcement in verifying that items being exported on a given shipment match the items on the related export license. For example, an AES filing noting a Serial Number of "ABC123XYZ" for a given rifle would provide no assistance in matching that particular rifle to the associated export license which does not list the serial number. Furthermore, it should be noted that attempting to address this reality by requiring firearm serial numbers to be listed on export license applications would contradict the very nature of the BIS licensing philosophy – allowing commodity-based predictive license quantities for use over a set time.

Another concern about the mandated electronic collection of serial number data for exported firearms is that it would amount to a de facto electronic government Registry of all exported firearms. Congress has, for many years and in many forms, prohibited the creation of a federal firearms registry. Specifically, the Firearms Owners Protection Act codified this intent of Congress in 18 U.S.C. § 926(a)(3), which states:

“No such rule or regulation prescribed after the date of the enactment of the Firearms Owners Protection Act may require that records required to be maintained under this chapter or any portion of the contents of such records, be recorded at or transferred to a facility owned, managed, or controlled by the United States or any State or any political subdivision thereof, nor that any system of registration of firearms, firearms owners, or firearms transactions or disposition be established. Nothing in this section expands or restricts the Secretary's authority to inquire into the disposition of any firearm in the course of a criminal investigation.”

To the extent that such a registry may aid law enforcement in the necessary function of tracing firearms, it should be noted that an effective system already exists through the ATF's National Tracing Center (NTC). The NTC relies primarily on the required records kept by Federal Firearms Licensees (FFLs), which already include the data elements of manufacturer, model designation, caliber and serial number, among others. As all U.S. commercial firearm exporters would be FFLs, this data is already kept in a proven system. To require it separately here would be unnecessarily duplicative and burdensome, without additional benefit.



#### Other additional data elements in AES (manufacturer, model number, caliber)

Existing regulations in both the FTR and EAR already require that the item description entered in the AES filing conforms to that shown on the license. Thus, the explicit addition of required data elements of "manufacturer, model number (and) caliber" would provide no further to ability for law enforcement to "effectively verify that firearms exports are properly authorized."

The Foreign Trade Regulations state for 'Commodity description', "If the shipment requires a license, the description reported in the EEI shall conform with that shown on the license." (15 CFR 30.6(a)(13))

The Export Administration Regulations state for 'Exports under a license', "...you must report on the EEI filing to the AES...an item description identical to the item description on the license." (15 CFR 758.1(g)(1))

Therefore, adding new required data elements would be unnecessarily duplicative and burdensome. Exporters are already required to enter data into AES in such a way that it can be matched to the export license by law enforcement verifying a shipment. If there has been a problem with exporters not doing this in the past and thus impeding law enforcement verification, it would be best addressed by educating on and enforcing the existing requirements of the FTR and EAR, rather than adding a new and duplicative information collection requirement specific only to firearms.

Furthermore, like serial numbers, all of these proposed data elements are already kept by Federal Firearms Licensees under the provisions of the Gun Control Act (GCA), and are accessible to law enforcement as needed.

Finally, if after consideration of our comments herein BIS decides to proceed with proposed § 758.1(g)(4) to include model, the wording "model number" should be changed to simply "model", or "model designation (if assigned)" instead. Only a fraction of firearm models are "numbers", while many others are names, and some do not have model designations assigned at all. ATF recognizes this in their Regulations which refer simply to "model", or in some cases "Model Designation (if assigned)."

#### CBP changes to AES as requested by BIS

The proposed rule notes that such a proposed requirement would only be included in the final rule "if CBP has made such data easily enterable in AES." As explained above, multiple regulations already require the data to be entered in such a manner that law enforcement can match it to the export license.

Yet, if BIS can work with CBP to affect one needed change to the AES, we would suggest allowing a much higher number of characters in the 'Commodity Description' field, which is currently limited to 45. This character count limit is likely a driving factor in any past verification issues experienced which may have compelled BIS to propose adding new data elements.



Exporters are already required to report all of the following within the 45-character ‘Commodity Description’ field for licensed items:

- “item description must be stated in Commerce Control List (CCL) terms” (15 CFR 758.1(g));
- “fully state the name of the commodity in terms that can be identified or associated with the language used in Schedule B or HTSUSA (usually the commercial name of the commodity), and any and all characteristics of the commodity that distinguish it from commodities of the same name covered by other Schedule B or HTSUSA classifications” (15 CFR 30.6(a)(13));
- “If the shipment requires a license, the description reported in the EEI shall conform with that shown on the license.” (15 CFR 30.6(a)(13));
- “When exporting under the authority of a license, you must report on the EEI filing to the AES ... an item description identical to the item description on the license.” (15 CFR 758.1(g)(1)).

As you can imagine, meeting even one of these requirements can use 45 or more characters (especially the “item description *identical* to the item description on the license” requirement). Therefore, simply allowing a much higher number of characters in this field (e.g. 200+) would allow exporters to include all of the required information to meet regulatory compliance requirements, and likely solve many issues. (BIS’ SNAP-R system allows up to 1,440 characters for each Export Item’s technical description, thus to truly enforce the EAR requirement of identical AES description reporting, it should be 1,440+).

#### Applicability to Temporary Exports / Imports under TMP

One note to all of this is that such a requirement of mandatory serial number reporting in AES might make sense only for Temporary Exports and Imports under TMP in particular, to allow re-import procedures to be followed and verified. However, the requirements proposed in new § 758.10(b)(1)(ii) and § 740.9(b)(5)(iv)(B) already cover this by requiring serial numbers as part of a complete list to be submitted to CBP at the time of import and/or export.

However, it should be noted that if a firearm is shipped under TMP for repair and then found to need replacement under RPL, then the serial number(s) of re-imported / re-exported items would be different than those originally reported to CBP. Perhaps the final rule could address this by providing certification language for such cases, e.g. “Serial # \_\_\_\_\_ on this shipment is a one-to-one replacement of defective serial # \_\_\_\_\_ under the authority of RPL. In accordance with the EAR, no further shipments will be made of the defective item already replaced under RPL.”

#### Paperwork Reduction Act analysis

In the Paperwork Reduction Act (PRA) Requirements analysis in the proposed rule, we note a couple of concerns. The PRA analysis rightly states (emphasis added): “The proposed rule would include a



requirement that, for *all* exports of items controlled under ECCNs 0A501.a...the exporter provide to CBP the serial number, make, model, and caliber for *each* firearm being exported.”

However, the analysis goes on to say “The Department of Commerce is carrying over the existing CBP filing requirements for items transferred from the USML to the CCL.” We are not aware of any existing CBP or ITAR requirement for explicit reporting of these data elements within AES, and believe this is a new requirement and new information collection.

Further, the analysis goes on to say “The Department of Homeland Security currently is collecting these data elements for firearms “subject to the ITAR” under OMB Control Number 1651-0010 (CBP Form 4457, Certificate of Registration for Personal Effects Taken Abroad). There is no change to the information being collected or to the burden hours as a result of this rule.” Again, we believe this is a new collection and not the same as the existing OMB-approved collection referenced. Specifically, CBP Form 4457 is only used for temporary exports, whereas this proposed rule would require these data elements to be reported for *all* firearm exports. As such, in reality there will be a very substantial increase to the burden hours and a new collection as a result of the proposed rule if published as written.

Even when only considering temporary exports recorded on the CBP Form 4457, explicitly requiring the listed data elements is different than the instrument itself which merely requests “Description of Articles”, leaving the format up to the exporter and CBP to record in such a way as will allow their proper identification upon re-import.

Note: these PRA-related comments have also been submitted directly to the designated contact at OMB in accordance with the directive in the proposed rule, but should nonetheless be considered and addressed by BIS in their final rule.

## **2. Change the proposed cut-off year for 'Antique' firearms to match U.S. law, current ITAR, and thus avoid adding additional burden in this rule.**

For domestic purposes, U.S. law defines antique firearms (in the Gun Control Act, 27 CFR § 478.11) as those "manufactured in or before 1898". For import purposes, Customs uses the same definition. For export purposes, the same definition and cut-off year has long been used (in the ITAR, 22 CFR 123.17(b)). However, without explanation, this proposed rule would significantly alter the definition of antique firearms by eliminating nine important years of manufacture. In this sense, the proposed rule as written is significantly more burdensome than the ITAR. We export many antique firearms made in the early-to-mid 1890's, such as early Winchester Model 1886, 1892 and 1894 rifles or early Colt Single Action Army revolvers. Under current law, these do not require an export license but can be shipped under exemption. However, changing this definition to "in or before 1890" would significantly and negatively change this, with no added national security benefit. The firearms manufactured in the 1890's do not pose a security threat to our Nation and are merely collector's pieces.





The lack of any explanation on this significant change in the proposed rule makes it seem almost as if it were a mistake or simple typo. It is our hope that this is the case and that the final rule will align this definition with U.S. domestic, import and historical export law instead of creating a new definition of its own. On the other hand, it seems that this change may be an attempt to align the proposed rule with the Wassenaar Arrangement definitions. If indeed this is the case, we still argue that aligning instead with existing U.S. law ("in or before 1898") is the best policy here, to avoid adding additional burden in this rule and to stay consistent with longstanding U.S. definitions of antique firearm. If however for some reason Commerce Department must align with the Wassenaar, then the proposed rule as written is still wrong. The Wassenaar Arrangement Munitions List uses the 1890 cut-off year for handguns, but actually uses "manufactured earlier than 1938" for antique rifles ([page 175, ML1.a, Note a,b](#)) and shotguns (page 176, ML1.b, Note a). Therefore, if aligning to Wassenaar, the year for rifles must be changed to "in or before 1938" and a similar definition of non-controlled antique shotguns must be added to 0A502.

Even if not aligning to Wassenaar in the final rule, we do request that the final rule adds a definition and cut-off year for antique shotguns to 0A502, ideally the same "in or before 1898" under other U.S. law. It does not make sense to have such a definition of antique rifles and handguns to allow for export of such items without a license but not have such a definition for antique shotguns. Shotguns are arguably already less military sensitive (thus their long-time inclusion as a dual use item on the EAR rather than on the ITAR). So, to allow for export of a handgun made in 1889 without a license but require a full export license for a sporting shotgun made in the same year does not make sense. This could be accomplished by simply adding a "Note 1 to 0A502" stating such. Or, if the existing "Note 1 to 0A501" is meant to include antique shotguns (it does not explicitly leave them out and states "antique firearms" generally), then it should be made more clear to this end.

### **3. Align availability of LVS at \$500 to 0A502 shotgun-related items.**

ECCN 0A501 allows a list based license exception for LVS at a \$500 threshold for 0A501.c, .d, and .x (and including .e if the ultimate destination is Canada). We greatly appreciate this being brought over from the comparable exemption(s) in the ITAR, and understand the justification for simplifying to a net \$500 value (vs. 'wholesale' value under the ITAR).

However, ECCN 0A502 for shotguns does not allow for LVS at any amount for comparable items. While we recognize that many small shotgun parts are not listed and thus EAR99, the proposed rule would control shotgun trigger mechanisms, magazines and magazine extension tubes more stringently than comparable parts for 0A501 rifles and handguns. For example, a \$45 two-round extension tube for a Remington 870 shotgun ([such as this item](#)) would require an export license, while a case of 0A501.d rifle magazines worth \$450 could be exported without a license under LVS.



Thus, we suggest aligning availability of LVS at \$500 to 0A502 shotgun-related items. Since these parts are currently listed in the ECCN 0A502 heading, the heading could be changed to “Shotguns and related commodities (See List of Items controlled)...” then under the “List of Items Controlled” enumerate the items to include “complete trigger mechanisms”, “magazines”, and “magazine extension tubes” with corresponding reasons for control allowing LVS for such items to the same \$500 limit as for 0A501 items.

#### **4. Align dollar value threshold of LVS for 0A505 ammunition components to \$500.**

We greatly appreciate the inclusion of 0A505.x ammunition components in the LVS exception for that ECCN. However, we find the \$100 limit to be low in many instances. Typically, to justify the cost of an international shipment, an order for such items is usually between \$100 to \$500. Per-unit cost of items such as unprimed brass can also be relatively high, particularly for specialty items likely to be sourced for a small shipment. For example, a recent shipment of Norma USA .470 Nitro Express reloading brass was \$5.44 per piece. They come in boxes of 25, so just two small boxes are worth \$272. Thus such a shipment would require a license if the LVS threshold is kept at \$100. We request that it be aligned to the other related LVS thresholds for firearms-related items at \$500 for consistency and usability.

#### **5. Define 'Complete Breech Mechanism' (for 0A501 and 0A502).**

The ITAR has long used the term “complete breech mechanism” without any definition to guide industry as to the meaning of this non-standard terminology. As this proposed rule continues to use this term, we request that a definition be provided. Over the years we have received varying definitions from representatives of DDTC. Our attempt to obtain an official written definition by means of an Advisory Opinion request was directed to instead be submitted as a request for an item-specific Commodity Jurisdiction. The most clear definition we’ve received to date is something comparable to a “complete bolt” or “complete bolt carrier group.”

To the extent that what is meant by “Complete Breech Mechanism” may possibly be covered by the enumerated items in 0A501.c, it could possibly even be deleted altogether. However, presuming that something additional is meant by this term being kept in a separate 0A501.e (and in the heading of 0A502), a definition is required for industry to properly comply with the proposed rules.

#### **6. Add License Exception ‘Servicing and replacement (RPL)’ as a valid purpose for a temporary import under new § 758.10.**

License exception RPL (§ 740.10(b)) allows for ‘Servicing and replacement’ including overhaul and reconditioning, so long as it does not change the basic characteristics (e.g. accuracy, capability, performance, or productivity) of the commodity. This is similar to comparable ITAR temporary import license exemption found at 22 CFR 123.4(a)(1).





So, it is our understanding that a firearm could be sent from a foreign sender to a United States party for servicing – a temporary import. However, the new § 758.10 “Entry clearance requirements for temporary imports” do not address the potential use of RPL for this purpose. Specifically, proposed § 758.10(b)(1)(i) requires a statement to CBP certifying “...This shipment will be exported in accordance with and under the authority of License Exception TMP.” However, if it was going under RPL rather than TMP, this statement would be a false certification.

#### **7. Clarify the classification of Combination Guns.**

From time to time we deal with firearms known as “combination guns”. Such firearms have at least one rifled barrel and at least one smoothbore barrel (generally a shotgun style barrel). While our reading of the proposed rules would leave us to believe 0A501 is the best fit for such items, we suggest that BIS add clarity on their proper classification.

This could be accomplished by changing the heading of ECCN 0A501 to instead read “0A501 Firearms (including combination guns, but excluding 0A502 shotguns) ...”. Or, a “Note 2 to 0A501” could be added to the bottom of that ECCN to read something like “Combination guns (those with at least one rifled barrel and at least one smoothbore barrel) are controlled by this ECCN.” Alternately, if they should instead be classified under 0A502 or otherwise, this should be clearly noted in the final rule.

#### **8. Clarify that new § 758.10 requirements do not apply to temporary imports under the provisions of ATF Form 6 NIA (27 CFR 478.115(d)).**

The proposed rules appropriately add §740.14(e)(4) to clarify that nonresident aliens leaving the United States may export 0A501 firearms and ammunition that they imported under the provisions of 27 CFR 478.115(d). However, the new § 758.10 “Entry clearance requirements for temporary imports” appears to apply to *all* temporary imports at the time of temporary import.

As the requirements of § 758.10 should not apply to nonresident aliens temporarily importing firearms under the separate provisions of the ATF, this should be clarified in the final rule. Wording to this effect could be added to § 758.10(a), ‘Scope’, whether within the body of (a) or as a new subparagraph (3). This would eliminate confusion wherein CBP may attempt to enforce the provisions of § 758.10 on nonresident aliens bringing firearms into the U.S. with an approved ATF Form 6 NIA for a hunting trip or shooting competition.

If this was not an oversight but rather the intent of BIS that § 758.10 would apply to such nonresident aliens, we strongly urge BIS to reconsider their position. Much like the challenge of the AES filing requirement for personal firearms being temporarily exported, requiring foreign persons to follow commercial procedures for temporary import and re-export (including AES filing) would be extremely cumbersome. New § 758.10 should not apply to such cases, and it should be made clear as such.



**10. Clarify whether 0A501.y includes only the specific enumerated y.1 through y.6, or all “specially designed” “parts,” “components,” “accessories” and “attachments”.**

ECCN 0A501.y lists six specific types of specially designed “parts,” “components,” “accessories” and “attachments” in various sub-paragraphs y.1 through y.6. However, the .y paragraph is not clear whether these are the only items controlled under .y, or if others not enumerated are included. While we do not believe this is intended to be a ‘catch-all’ like .x, it is not as clear as the .y sections of other ECCNs which tend to use the wording “as follows” when applicable preceding an enumerated list.

For example, a set of fiber-optic sights for a pistol are not “iron sights” as listed in y.3, but may be “specially designed” “attachments.” Would such an item be controlled under .y? Even though Controls only apply to .y for UN and AT purposes, whether such non-enumerated “attachments” require AES filing, etc. for most countries depends on the clarification of this .y sub-paragraph.

**11. Explicitly clarify the classification of detachable firearm magazines with capacity  $\leq$  16 rounds.**

Another potential “attachment” item that would benefit from explicit clarification in this regard is detachable magazines for 0A501 firearms with a capacity of less than or equal to 16 rounds. While 0A501.d explicitly lists magazines with a capacity of greater than 16 rounds, common magazines with a lesser capacity are sure to be one of the most shipped items related to firearms.

We have already heard varying interpretations from highly reputable firms within the industry as to whether such magazines would be controlled. For example, those who interpret such magazines as an “attachment” (they are not necessary for the operation of a firearm, but do enhance their usefulness), and who understand the .y paragraph to only include those specifically-enumerated items (see above), have stated that such magazines are EAR99. On the other hand, those who interpret .y to include all “specially designed” “attachments” in addition to those specifically enumerated, believe that such magazines are controlled under .y and require AES filings regardless of destination.

To eliminate this confusion, a “Note” could be added to the bottom of the ECCN, such as “Note 3 to 0A501: Detachable magazines with a capacity of less than or equal to 16 rounds “specially designed” for a commodity controlled by paragraph .a or .b of this entry are classified as “attachments” and are EAR99 commodities.”

**12. Eliminate duplicative new § 762.2(a)(11) recordkeeping requirement.**

Proposed new § 762.2(a)(11) would add as an EAR record the “serial number, make, model and caliber for any firearm controlled in ECCN 0A501.a” and for certain shotguns. However, the Government already requires such records to be kept under the provisions of the Gun Control Act (GCA). Thus, the requirement that exporters maintain such as an EAR record is unnecessarily duplicative and



burdensome. Under the time-tested provisions of the GCA, the government already has access to such records for inspection as needed.

### **Proposed Effective Date of Final Rule**

We suggest that BIS implement a split effective date for the Final Rule, as was done for the 2014 final rule in 79 FR 37535. In the case of the proposed rule now at hand, many companies will require the full 180 days to make changes to their internal systems and classification matrixes. As such, a 180 day effective date should be allowed for such companies. On the other hand, smaller companies who are most burdened by the registration costs and other requirements of the ITAR, will be more agile and able to switch over earlier. For example, gunsmiths who do no exporting but are currently required to register and pay related fees to DDTC would benefit greatly from an immediate (or very short) effective date of the final rule. To the extent possible, a split effective date (immediate / 180 days) would be advisable.

Regardless of the effective date published in the final rule, we respectfully request that BIS and DDTC complete their review of comments and publish a Final Rule as soon as is reasonably possible. Given the long-awaited nature of these rules, prompt publishing of the Final Rule after appropriate review and consideration of all comments would be greatly appreciated and beneficial to both industry and government.

### **Summary and Conclusion**

While we have raised a number of important concerns specific to the implementation of this proposed rule, we wish to emphasize again our overall support of the transition of these items from the ITAR to the EAR. The justification provided is clear and absolutely sensible. Regardless of recent politicization of the issue by some in Congress and the media, this has truly been an historic bipartisan effort over many years, starting in the earliest days of the Obama administration and now coming to fruition under the current administration.

On a separate but related note, BORDERVIEW also requests the publishing of BIS' already-drafted 'shotgun rule' to allow the Canadian IIC to act as the export authorization for shotguns to Canada.

BORDERVIEW looks forward to your publishing of the Final Rule after careful review of our enclosed comments, and those of other impacted parties. Please do not hesitate to contact me with any questions.

A handwritten signature in black ink that reads "Joel VanderHoek". The signature is fluid and cursive, with the first name "Joel" being more prominent.

**Joel VanderHoek**

President & Operations Manager

BORDERVIEW | *International Firearm Logistics*

joel@borderview.com phone: + 1 (877) 947-4867

*surprisingly simple.*<sup>TM</sup>

# PUBLIC SUBMISSION

<b>As of:</b> 7/12/18 9:00 AM
<b>Received:</b> July 09, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 12, 2018
<b>Tracking No.</b> 1k2-946r-p0t5
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-0322

Public Comment 1000. Individual. R Dobbins.7-9-18

---

## Submitter Information

**Name:** Roberta Dobbins

---

## General Comment

I strenuously object to the proposed rule to transfer regulation of firearms exports from the State Department to the Department of Commerce. The State Department is best equipped to handle this role. It is vitally important for the United States to restrict sales of firearms to oppressive regimes and prevent them from falling into the hands of terrorist and organized crime groups. Given the emerging tensions and uncertainties in international relations, firearm exports require increased regulation as military devices, not less.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:03 PM
<b>Received:</b> July 03, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942r-vxwh
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1212

Public Comment 1001. Individual. laura harness. 7-3-18

---

## Submitter Information

**Name:** laura harness

---

## General Comment

Please keep arms regulations under the DOS to keep the world a safer place. Unregulated arms sales will increase violence in the world therefore increasing immigrants seeking asylum, such as those from central America. The commerce dept is focused on sales and profits and isn't the appropriate organization to regulate arms sales.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:04 PM
<b>Received:</b> July 03, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942r-7uip
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1214

Public Comment 1002. Individual. Pat Dingleberry. 7-3-18

---

## Submitter Information

**Name:** Pat Dingleberry

**Address:**

111 Sterling Ave

Jersey City, NJ, 07305-1425

**Email:** pdingleberry@comcast.net

---

## General Comment

I think moving control of international firearms sales from the State Dept. to the Dept. of Commerce would be a huge mistake, especially because Congress would be out of the loop and this could have serious complications for the international community. The Dept. of Commerce's job is to promote sales with no regard to the possible consequences, therefore I strongly oppose this change.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:05 PM
<b>Received:</b> July 03, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942r-upqi
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1216

Public Comment 1003. Individual. Karen Jacques. 7-3-18

---

## Submitter Information

**Name:** Karen Jacques

**Address:**

1209 T St

Sacramento, CA, 95811

**Email:** threegables1819@gmail.com

---

## General Comment

I want to express my strong opposition to switching the oversight of firearms sales to buyers in other countries from the State Department to the Department of Commerce. At least under State Department authority Congress is notified of such sales and can choose to block there for national security reasons even to countries with blatant human rights violations. The proposed change will likely make it easier for terrorists, criminal gangs and other dangerous organizations to get their hands on these weapons. As far as I can tell, the only people who will benefit from this change are the firearms manufacturers and the criminals who will be able to get firearms more easily.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:06 PM
<b>Received:</b> July 03, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942r-5zsj
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1218

Public Comment 1004. Individual. Amy Dewey. 7-3-18

---

## Submitter Information

**Name:** Amy Dewey

---

## General Comment

I oppose switching regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.



# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:06 PM
<b>Received:</b> July 03, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942r-ab9q
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1219

Public Comment 1005. Individual. Priscilla Bade. 7-3-18

---

## Submitter Information

**Name:** Priscilla Bade

**Address:**

PSC 80 BOX 14131

APO, 96367

---

## General Comment

The approval of gun sales outside the US concerns me.

These guns may be used in acts of organized crime, political violence, terrorism, and human rights violations as well as an n crimes against American citizens.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

The Commerce Department does not have adequate staffing to enforce regulation and monitoring. Moreover, enforcement of regulation in other domains would prove nearly impossible.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:08 PM <b>Received:</b> July 04, 2018 <b>Status:</b> Posted <b>Posted:</b> July 16, 2018 <b>Tracking No.</b> 1k2-942s-tni6 <b>Comments Due:</b> July 09, 2018 <b>Submission Type:</b> Web
--

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1220

Public Comment 1006. Individual. Kae Bender. 7-4-18

---

## Submitter Information

**Name:** Kae Bender

---

## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The U.S. State Department focuses on safeguarding our nation whereas the U.S. Commerce Department focuses on promoting American business. Clearly the concern of firearms in the wrong hands is of fundamental concern to the State Department, whereas the Commerce Department would only want to sell more arms abroa. We must insist that the security of our nation take precedence over the profits of some arms providers.

Firearms exports are rightly classified as military" and blocking sales of large batches of firearms to foreign countries is a reasonable control to prevent the unleashing of weapons into the hands of those who could cause serious harm to human rights, international relations, or even our own national security. Further, commercial export of large caches of American guns and ammunition could make it too easy for firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents to obtain enough weapons to wreak havoc around the world. These are serious concerns.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Exporting firearms should be subject to more controls, not less! The Commerce Dept. is NOT ready or able to maintain the stringent controls and oversight that is needed to keep weapons trade restricted enough to handle export licensing, shipment inspections, and other appropriate restrictions on the types, quantities, and categories of firearms exports.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:08 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942s-i27e
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1222

Public Comment 1007. Individual. Carol Olivier. 7-4-18

---

## Submitter Information

**Name:** Carol Olivier

**Address:**

2451 s Kent-Des moines

Seattle, WA, 98198

**Email:** sagefemmes@yahoo.com

**Phone:** 206-599-9400

---

## General Comment

I oppose changing regulation of gun sales to the commerce dept. guns are deadly, period. We already are the world's largest gun exporter and the whole world is violently unstable as a consequence. No one can afford the consequences of more violence if there is a lack of oversight and regulation of weapon sales.

Sincerely, Carol Olivier

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:09 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942s-dqt2
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1224

Public Comment 1008. Individual. Andrew Aguiar. 7-4-18

---

## Submitter Information

**Name:** Andrew Aguiar

---

## General Comment

We dont need more commerce involving the gun trade!

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:10 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942s-jcfq
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1225

Public Comment 1009. Individual. Francis Fedoroff. 7-4-18

---

## Submitter Information

**Name:** Francis Fedoroff

---

## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Guns are weapons not commodities. Gun sales require special oversight.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:11 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942s-p9vv
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1227

Public Comment 1010. Individual. Kathy Yeomans. 7-4-18

---

## Submitter Information

**Name:** Kathy Yeomans

---

## General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less! Guns have only one use and that is to kill.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:12 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942s-knfd
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1229

Public Comment 1011. Individual. Bart Ryan. 7-4-18

---

## Submitter Information

**Name:** Bart Ryan

---

## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere.

This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

It would remove the State Departments block on the 3D printing of firearms.

When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Also...

More guns against America is more guns against America, no matter how thinly or big you slice it for

Republicans or for Democrats. Even the Trump administration should realize how destructive and dangerous this really is.



# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:13 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942s-xrxu
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1230

Public Comment 1012. Individual. Kim Myers. 7-4-18

---

## Submitter Information

**Name:** Kim Myers

**Address:**

376 Dee Farrell Rd  
Pittsboro, NC, 27312

**Email:** flyingmoosegal@yahoo.com

**Phone:** 9194821480

**Fax:** 27312

---

## General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. How many more people have to be gunned down in the world or will it take the murder of someone in your family for it to finally hit home! I am trying to raise my 7 and 8 year old granddaughters, and if I could move to any other country to escape what is happening to America, I surely would. I do not want to raise them where going to school has become deadly. I am embarrassed to be an American. With this president, it is only about the money anymore.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:13 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942s-duiv
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1231

Public Comment 1013. Individual. Jeffrey Greif. 7-4-18

---

## Submitter Information

**Name:** Jeffrey Greif

---

## General Comment

Firearms exports should continue be classified as "military" and remain under the control of the Department of State. I oppose the proposed rule change.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:14 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942s-cfgv
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1233

Public Comment 1014. Individual. Rene Maas. 7-4-18

---

## Submitter Information

**Name:** Rene Maas

**Address:**

16908 51st Avenue N.

Plymouth, MN, 55446

**Email:** rgmaas12@yahoo.com

**Phone:** 7633549423

**Fax:** 55446

---

## General Comment

Hi - I believe that firearm sales outside of the US need to be monitored by the State Department and not by the Commerce Department. The State Department has many more resources worldwide to track large sales and shipments and to keep Congress up to date with any concerns. The Commerce Department does a great job monitoring the areas it is responsible for, but worldwide sales of American firearms should not be one of its responsibilities. Can you tell if a shipment or large sale went to Russia or Spain?? To Iraq or ISIS??? The State Department can.

Thank you for listening!

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:17 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942s-z35f
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1236

Public Comment 1015. Individual. Lowell Richardson. 7-4-18

---

## Submitter Information

**Name:** Lowell Richardson

**Address:**

5050 Osgood Way

Fair Oaks, 95628

**Email:** lowell@catalinadirect.com

**Phone:** 9162173932

---

## General Comment

Why would we switch the regulation of firearms exports from the State Department to the Commerce Department? Our government should not be in the business of promoting lethal firearm sales around the world. We should reducing

We must limit firearms exports to oppressive regimes, not encourage them. We must strengthen safeguards that help keep organized crime and terrorist organizations from obtaining weapons, not weaken them.

Why would our government eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them?

One good example of the danger of unregulated gun sales is the rampant smuggling of guns across the Mexican border. The vast amount of weapons easily available across the boarder, sourced from unregulated American gun shows has turned Mexico into a killing field. We do not need to promote the same death and destruction in other parts of the world by removing licensing requirements for brokers.

And removing the State Departments block on the 3D printing of firearms BY transferring the authority to the Department of Commerce is simply ridiculous.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:18 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942s-n52x
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1237

Public Comment 1016. Individual. Jim Yarbrough. 7-4-18

---

## Submitter Information

**Name:** Jim Yarbrough

---

## General Comment

I oppose this rule change that would switch the regulation of firearms export from the U.S. State Department to the U.S. Commerce Department. This rule change would dangerously reduce control and oversight of firearms. Firearms export should continue to be regulated by U.S. State Department.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:18 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942s-2yqa
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1238

Public Comment 1017. Individual. Laurie Meisenheimer. 7-4-18

---

## Submitter Information

**Name:** Laurie Meisenheimer

---

## General Comment

I can't believe anyone is even thinking of moving something so desperately in need of careful, vigilant and well staffed regulation as arms sales from the State Department to the Department of Commerce. Arms in the wrong hands are the most dangerous thing that can happen to folks!!! It causes so much carnage to innocent folks. It does nothing but harm! Dont let it happen!!!!

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:19 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942s-shqx
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1239

Public Comment 1018. Individual. Carolyn Lilly. 7-4-18

---

## Submitter Information

**Name:** Carolyn Lilly

**Address:**

6114 Caminito Sacate

San Diego, 92120

**Email:** cclilly@icloud.com

**Phone:** 6195019345

---

## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Only YOU can stop the carnage of our children and all people, so do your responsibility - no corruption!

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:20 PM <b>Received:</b> July 04, 2018 <b>Status:</b> Posted <b>Posted:</b> July 16, 2018 <b>Tracking No.</b> 1k2-942s-vlsk <b>Comments Due:</b> July 09, 2018 <b>Submission Type:</b> Web
--

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1240

Public Comment 1019. Individual. jef weisel. 7-4-18

---

## Submitter Information

**Name:** jef weisel

**Address:**

44 high st  
keene, 03431

**Email:** wowwees@yahoo.com

**Phone:** 6039037329

**Fax:** 03431

---

## General Comment

keep state dept in charge of export licensing for weapons, especially semi- and automatic weapons!



# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:20 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942s-i0x6
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1241

Public Comment 1020. Individual. Barbara Holcomb. 7-4-18

---

## Submitter Information

**Name:** Barbara Holcomb

---

## General Comment

The US is already one the largest exporters of firearms. Please do not make the world more violent by enacting the proposed rule.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:21 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942s-c595
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1242

Public Comment 1021. Individual. Nancy Borelli. 7-4-18

---

## Submitter Information

**Name:** Nancy Borelli

**Address:**

Santa Rosa Va, CA, 93012

**Email:** nancyborelli@gmail.com

**Phone:** 8059076523

---

## General Comment

Do not remove the responsibility of regulating firearms for export from the State Department and move it to the Commerce Department. The State Department has a multi-layer oversight system with licensing and multiple inspections firmly in place, and the Commerce Department does not have the resources to provide the same protections. Moving the regulation of firearms exports to the Commerce Department would make the world a much more dangerous place. Do not allow the Commerce Department to take the responsibility of regulating firearms exports away from the State Department, which is handling the responsibility effectively.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:22 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942s-2f9c
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1243

Public Comment 1022. Anonymous. 7-4-18

---

## Submitter Information

**Name:** Anonymous Anonymous

---

## General Comment

I oppose switching the regulation of firearms exports from the State Department to the Commerce Department. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. This is an all around bad idea that would make everyone less safe.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:23 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942s-om60
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1244

Public Comment 1023. Individual. Sue Whitlock. 7-4-18

---

## Submitter Information

**Name:** Sue Whitlock

---

## General Comment

You are absolutely crazy if you think semi-automatic weapons no longer warrant control!!! The President will have security guards-we won't! Anybody can shoot anybody then! Do not pass this!!

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:23 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942s-g4o0
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1245

Public Comment 1024. Individual. Deborah Meckler. 7-4-18

---

## Submitter Information

**Name:** Deborah Meckler

**Address:**

3948 Stein Ct

So San Francisco, 94080

**Email:** deborahmeckler@comcast.net

**Fax:** 94080

---

## General Comment

I oppose moving the regulation of overseas gun sales from the State Department to the Commerce Department. Guns are for killing people. They are not commodities to be sold like soybeans. They are ugly, killing machines. They should NOT be treated as if they were harmless merchandise. Why are we as a nation promoting killing?

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:24 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942s-g0tl
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1246

Public Comment 1025. Individual. Susannah Gelbart. 7-4-18

---

## Submitter Information

**Name:** Susannah Gelbart

---

## General Comment

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

This would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. There is no reason to remove these requirements. Also, it would remove licensing requirements for brokers, increasing the risk of trafficking. Finally, it would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less! Just watch the newly released video of the police department in Las Vegas being too scared to take out the gunmen on October first. They knew they were far out gunned. They know how dangerous and deadly guns are. Fifty-eight died, while the police were right in the building completely aware of where the shots were coming from. They did not stop the killing. Laws need to do more to better protect unarmed citizens, everyday.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:25 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942s-elqa
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1247

Public Comment 1026. Individual. Jo Ann Potashnick. 7-4-18

---

## Submitter Information

**Name:** Jo Ann Potashnick

**Address:**

528A W. Barry Avenue  
Chicago, IL, 60657-5417

**Email:** jarp@rcn.com

**Phone:** 7738834441

---

## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This reduces security for us citizens everywhere!

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:26 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942s-oq4t
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1248

Public Comment 1027. Individual. Anonymous Wood. 7-4-18

---

## Submitter Information

**Name:** Anonymous Wood

---

## General Comment

I am strongly opposed to the proposal to change the regulation of firearm sales from the state department to the department of commerce. A move like this would likely destabilize many other countries and places in the world by providing easier access to firearms with fewer regulations on who can purchase them and for what purpose. Firearm sales outside of the US are military deals and should be regulated and controlled tightly. I believe the state department is better equipped and prepared to provide this regulation than the commerce department.



# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:26 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942t-6fsi
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1249

Public Comment 1028. Individual. Dr. Demian. 7-4-18

---

## Submitter Information

**Name:** Dr. Demian

**Address:**

Seattle, WA, 98146

**Email:** demian@buddybuddy.com

---

## General Comment

DO NOT change the U.S. State Department rules regarding firearms exported from America.  
DO NOT allow the U.S. Commerce Department to have control of exports.

Thank you.

Dr. Demian

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:27 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942t-lywm
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1250

Public Comment 1029. Individual. RedLion York. 7-4-18

---

## Submitter Information

**Name:** RedLion York

**Address:**

2001 Creekwood Dr

Fort Collins, 80525

**Email:** redyork@gmail.com

**Phone:** 9702215929

**Fax:** 80525

---

## General Comment

Howdy,

Switching the responsibility for overseeing weapons sales from the State Dept to the Commerce Dept is a bad idea for these reasons:

- a) It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- b) It would remove licensing requirements for brokers, increasing the risk of trafficking.
- c) It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

The world is dangerous enough. We don't need this change.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:28 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942t-88ks
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1251

Public Comment 1030. Anonymous. 7-4-18

---

## Submitter Information

**Name:** Anonymous Anonymous

---

## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. In my opinion, this is a bad decision that could have implications affecting our national security, and should be rejected outright.

Thank you for your time,

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:30 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942t-fyrg
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1252

Public Comment 1031. Individual. Jean Schwinberg. 7-4-18

---

## Submitter Information

**Name:** Jean Schwinberg

---

## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The U.S. Commerce Department is focused on promoting American business, not on safeguarding the nation, which is the responsibility of the U.S. State Department. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:31 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942t-st08
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1253

Public Comment 1032. Individual. Mo Kafka. 7-4-18

---

## Submitter Information

**Name:** Mo Kafka

**Address:**

Provincetown, MA, 02657

**Email:** mokafka@gmail.com

**Phone:** 5184341600

**Organization:** Building Integrity

---

## General Comment

Thank you for considering this important concern. Currently, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

It is essential that this rule not be changed as it will not benefit national security or international relations and it will make the world a more dangerous place.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:31 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942t-aqnk
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1254

Public Comment 1033. Individual. Margaret Stofsky. 7-4-18

---

## Submitter Information

**Name:** Margaret Stofsky

**Address:**

2534 Manzanita Ave  
EUREKA, CA, 95503

**Email:** mstofsky87@gmail.com

**Phone:** 9142614849

---

## General Comment

I oppose the proposed rule change. It would give firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:33 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942t-b68j
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1255

Public Comment 1034. Individual. Sean Kelly. 7-4-18

---

## Submitter Information

**Name:** Sean Kelly

---

## General Comment

I strongly oppose shifting firearms oversight from the State Department to the Commerce Department. Streamlining and encouraging the sale of firearms, and reducing inspections and enforcement, is solidly AGAINST the interests of the U.S.:

Internationally, high firearm availability correlates strongly with high firearm violence and fatalities. Making firearms more available WITHIN the U.S. by putting less scrutiny on shipments is the OPPOSITE of what we need to do in a climate of increasing criminal shooting acts.

Many of the most pressing international crises, from conflict in the middle east to the migration crisis from Central America, are fueled by violence utilizing American-made weapons. By making it easier to get American firearms abroad, we are only jeopardizing our OWN national interests.

While it is ultimately impossible to outright prevent individuals from acquiring information to design and/or manufacture firearms and components via 3D printing techniques, it is senseless to remove existing barriers to doing so. More firearms of questionable quality in the hands of more people with questionable training is an absolute recipe for disaster.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:35 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942t-vby6
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1256

Public Comment 1035. Individual. Gale Green. 7-4-18

---

## Submitter Information

**Name:** Gale Green

**Address:**

1329 Sycamore #106

DeKalb, IL, 60115

**Email:** gggreen@wisc.edu

**Phone:** 815 517-8981

---

## General Comment

Guns need to be treated with the utmost respect, especially the governing of them. Please leave that responsibility in the hands of the U.S. Department of State, whom I believe are in a better position to protect the welfare of all our citizens. Thank-you and God Bless all concerned. Gale M. Green



# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:35 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942t-6hyu
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1257

Public Comment 1036. Individual. Nancy Lemmon. 7-4-18

---

## Submitter Information

**Name:** Nancy Lemmon

---

## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It seems IRRESPONSIBLE to hand over such a sensitive matter to our national security to a body focused on commerce.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:36 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942t-yub2
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1258

Public Comment 1037. Anonymous. 7-4-18

---

## Submitter Information

**Name:** Anonymous Anonymous

---

## General Comment

I oppose changing the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. This rule change would make the world a far more dangerous place because the Commerce Department is not equipped to handle the terrible global security problems that they could create.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:37 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942u-9lv0
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1259

Public Comment 1038. Individual. Michael Olcsvary. 7-4-18

---

## Submitter Information

**Name:** Michael Olcsvary

**Address:**

United States, 98036

**Email:** olcsvary@frontier.com

---

## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Military equipment could very well end up in the hands of some less-than-friendly individuals or groups.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:37 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942u-beym
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1260

Public Comment 1039. Individual. Justin Mebane. 7-4-18

---

## Submitter Information

**Name:** Justin Mebane

**Address:**

Wilmington, NC, 28411

**Email:** superjustin11@aol.com

---

## General Comment

This rule change will transfer regulation of foreign arms from the State Department to the Commerce Department - which does not have the resources necessary to keep track of these sales. This would be a major threat to our national security and fuel instability in other countries - increasing migration to the US. This rule needs to be rejected immediately.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:38 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942u-524k
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1261

Public Comment 1040. Individual. Suzanne Phillips. 7-4-18

---

## Submitter Information

**Name:** Suzanne Phillips

**Address:**

906 Puget Way

Edmonds, WA, 98020

**Email:** Gzy906@gmail.com

**Phone:** 425 967-7640

---

## General Comment

Firearms are dangerous and exist only to kill. They should be less available to all and certainly not exported for pure profit motives. People die daily from their existence. Making money off of the death of innocents is horrendous.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:39 PM <b>Received:</b> July 04, 2018 <b>Status:</b> Posted <b>Posted:</b> July 16, 2018 <b>Tracking No.</b> 1k2-942u-61ft <b>Comments Due:</b> July 09, 2018 <b>Submission Type:</b> Web
--

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1262

Public Comment 1041. Individual. Donia Connell. 7-4-18

---

## Submitter Information

**Name:** Donia Connell

**Address:**

2825 NE County Road 329

Anthony, FL, 32617

**Email:** jdconnell@embarqmail.com

**Phone:** 3522246115

**Fax:** 32617

---

## General Comment

The NRA only cares about making a buck. This switch could and most likely would benefit terrorist groups being funded by corrupt countries.

If the NRA gets their wish, all the countries weve unjustifiably attacked, who with good cause now hate us are certain to have top of the line weapons to kill us with.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:40 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942u-b213
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1263

Public Comment 1042. Individual. Robert Heisler. 7-4-18

---

## Submitter Information

**Name:** Robert Heisler

**Address:**

san francisco, CA, 94116

**Email:** ROBIKAM\_2000@YAHOO.COM

**Phone:** 4156652597

**Organization:** OVER THE AIR, NO CABLE MAFIA RIPOFF FOR ME!

---

## General Comment

Arms sales need to be even more restricted and regulated, not less. US arms sales are contributing to massive terrorism and human rights abuse because of our loose oversight.

.The American people are sick of the control the NRA has over the legislators who swore to protect and uphold the will of the American people. The NRA is and operates as a criminal syndicate with the republican party as it's paid agent in congress.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 3:41 PM <b>Received:</b> July 04, 2018 <b>Status:</b> Posted <b>Posted:</b> July 16, 2018 <b>Tracking No.</b> 1k2-942t-m6s2 <b>Comments Due:</b> July 09, 2018 <b>Submission Type:</b> Web
--

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1264

Public Comment 1043. Individual. Onishea Aguilera. 7-4-18

---

## Submitter Information

**Name:** Onishea Aguilera

**Address:**

107 Avenida Del Sol  
Lordsburg, NM, 88045

**Email:** onisheaaguilera@yahoo.com

**Phone:** 5753131715

**Fax:** 88045

---

## General Comment

I myself love guns but I do not support these weak gun laws and I never will support the crooked NRA!!!



# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 4:00 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942u-mxad
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1271

Public Comment 1044. Individual. Robert Hall. 7-4-18

---

## Submitter Information

**Name:** Robert Hall

---

## General Comment

I strongly OPPOSE changing the classification of selling firearms to foreign countries that would switch such sales from the US State Dept. to the US Commerce Dept.

Selling weapons to other countries is not selling a commodity, like wheat; it is selling lethality and this needs the continued oversight of the State Dept.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 4:01 PM <b>Received:</b> July 04, 2018 <b>Status:</b> Posted <b>Posted:</b> July 16, 2018 <b>Tracking No.</b> 1k2-942u-iby6 <b>Comments Due:</b> July 09, 2018 <b>Submission Type:</b> Web
--

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1272

Public Comment 1045. Individual. Diana Morgan-Hickey. 7-4-18

---

## Submitter Information

**Name:** Diana Morgan-Hickey

---

## General Comment

Stop all gun promotion-in the States or around the world.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 4:02 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942u-j8kq
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1273

Public Comment 1046. Individual. Anneliese Schultz. 7-4-18

---

## Submitter Information

**Name:** Anneliese Schultz

**Address:**

76 Lawrence Road

Gray, ME, 04039

**Email:** aschultz@mail.ubc.ca

---

## General Comment

I oppose any rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. I believe this would be an extremely dangerous, causing arms sales to vastly increase internationally, with serious implications for our national security.

If this change were made, firearms exports to oppressive regimes would be facilitated, safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons would be removed, and the violence that destabilizes countries and causes mass migration would be fueled!

Please oppose this terrible proposal, and help keep our country safe.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 4:02 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942u-ntfz
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1274

Public Comment 1047. Individual. Elaine Fischer. 7-4-18

---

## Submitter Information

**Name:** Elaine Fischer

**Address:**

2514 Sharmar Rd.  
Roanoke, VA, 24018

---

## General Comment

It is INSANE to sell guns to everyone and not expect them to be turned on us! Please do NOT loosen the rules for firearms export, just to allow for greedy Corporate Profit.

Right now, firearms exports are classified as military (as they should be). This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 4:03 PM <b>Received:</b> July 04, 2018 <b>Status:</b> Posted <b>Posted:</b> July 16, 2018 <b>Tracking No.</b> 1k2-942u-7eme <b>Comments Due:</b> July 09, 2018 <b>Submission Type:</b> Web
--

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1275

Public Comment 1048. Individual. Alex Escott. 7-4-18

---

## Submitter Information

**Name:** Alex Escott

---

## General Comment

I am a gun owner and I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 4:04 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942v-4q2f
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1276

Public Comment 1049. Anonymous. 7-4-18

---

## Submitter Information

**Name:** Anonymous Anonymous

---

## General Comment

I oppose this rule change that would switch the regulation of firearms export from the US State Dept to the US Commerce Dept.

Controlling gun sales to foreign countries is important to countering terrorism, and for ensuring national safety. The US Commerce Dept does not have sufficient resources to regulate these foreign sales adequately. That responsibility should remain with the US State Dept.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 4:04 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942v-5bxi
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1277

Public Comment 1050. Individual. Stephanie Stout. 7-4-18

---

## Submitter Information

**Name:** Stephanie Stout

---

## General Comment

I do not want the handling of export licenses of semiautomatic assault rifles and other powerful military style firearms moved from the U.S. State Department to the U.S. Commerce Department. Regardless of how profitable the sales of more US made weapons would be to our firearms manufacturers, producing and selling more weapons to more nations of our violent planet would ultimately undermine US safety and security. Criminals and terrorists would use these additional weapons to prey upon Americans and our friends abroad and in our own country. There are already too many weapons loose in the world already. I am a retired US Army combat veteran, and I served to protect my country and our allies and friends, not to promote the profits of GREEDY multi-national corporations. Furthermore, our arms industry should be completely nationalized in order to produce necessary weapons and military equipment for our forces and those of our allies at lower cost and remove the profit motive for selling weapons of war.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 4:05 PM <b>Received:</b> July 04, 2018 <b>Status:</b> Posted <b>Posted:</b> July 16, 2018 <b>Tracking No.</b> 1k2-942v-yenu <b>Comments Due:</b> July 09, 2018 <b>Submission Type:</b> Web
--

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1278

Public Comment 1051. Individual. Betty Winholtz. 7-4-18

---

## Submitter Information

**Name:** Betty Winholtz

**Address:**

405 acacia

Morro Bay, CA, 93442

**Email:** winholtz@sbcglobal.net

---

## General Comment

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.

With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Not only will lives in other countries be in danger, but guns made here can be used against us.

What are you thinking!



# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 4:06 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942v-b4xy
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1279

Public Comment 1052. Individual. Will Branch. 7-4-18

---

## Submitter Information

**Name:** Will Branch

---

## General Comment

I oppose the proposed rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This change may be beneficial to American business, but it is detrimental to American security.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 4:09 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942v-68po
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1280

Public Comment 1053. Individual. Eloise Prevost. 7-4-18

---

## Submitter Information

**Name:** Eloise Prevost

**Address:**

9332 W Mariposa Grande Ln

Peoria, AZ, 85383

**Email:** EDP1953@AOL.COM

**Phone:** 5084961428

---

## General Comment

Do not change policies to the commerce dept !!!! It is all about \$\$\$ and not safety. Guns kill in the wrong hands. This is not good. The world is evil enough without providing firearms to bad individuals. It is more than obvious. Too many people in office care more about how much money can be made in business transactions than the world wide safety of people and animal lives.

Every day someone in government is ripping apart government policies and trying to undo protections. Elected officials need to listen to the public and not the big greedy corporations.

Really sad that our American government can't even balance their own budget and continually waste so much money to the point of debt in the trillions of dollars.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 4:10 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942v-itkf
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1281

Public Comment 1054. Individual. Natasha Gubert. 7-4-18

---

## Submitter Information

**Name:** Natasha Gubert

---

## General Comment

please do not allow the purview of firearms sales to be transferred from the State Department to the Commerce Department. The proliferation of arms sales freed from the oversight now mandated by law would mean that all kinds of evil people could buy high capacity weapons with impunity.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 4:11 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942v-6yax
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1282

Public Comment 1055. Individual. Dave Kisor. 7-4-18

---

## Submitter Information

**Name:** Dave Kisor

---

## General Comment

Safety is not what the NRA and the gun industry are concerned with. It's sales. They don't care who shoots who, they only see their profit margin going through the roof. The only problem is there are already too many guns out there already. The only positive here is American weapons tend to jam more often than European and Asian weapons, so the American profit margin probably won't be as high as they would like. To that end, the American manufacturers will undoubtedly whine like babies about unfair competition. American manufacturers don't focus on efficiency, but rather mega sales; whereas, European and Asian manufacturers strive for efficiency. During WW2, the Luftwaffe had Rheinmetall design and build a 30MM cannon for their fighters that could take down a bomber with 5 to 7 rounds outside of the range of our 50 calibers and they did it. Bomber crews called it the Jackhammer and it terrified them. A Soviet Sergeant named Kalishnikov acquired a German machine gun on the Eastern front and made some modifications. It was used in the early part of the Korean Conflict and the Army wasn't concerned. After Shenyang got it and put a sealed receiver group in it, our Armed Forces became very concerned over this new weapon, that was to become the most widely used a popular weapon in the world today, the AK-47. Don't expect American weapons to replace that anytime soon.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 4:11 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942v-7x0y
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1283

Public Comment 1056. Individual. Mary McLaughlin Sta. Maria. 7-4-18

---

## Submitter Information

**Name:** Mary McLaughlin Sta. Maria

---

## General Comment

I oppose switching control of firearms from the State to the Commerce Dept. You should be ashamed if money is worth that to you.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 4:12 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942w-b62k
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1284

Public Comment 1057. Individual. Barbara Johns. 7-4-18

---

## Submitter Information

**Name:** Barbara Johns

---

## General Comment

We will keep speaking out and speaking out we will. Our schools are no longer safe why is that? We need to feel safe outside of our homes. People don't want to live in fear anymore. There is way to much shootings going on in America and that is not good. Whatever happened to safety first? Whatever happened to respect and common sense? Whatever happened to morals and values? Do tell? We all would like to know that now. This has gone on long enough now so changes need to be made to make our schools feel safe again. These families of victims are upset, angry and frustrated on how gun control is going. What laws we do have do not work anymore. Guns are not toys. Guns are dangerous. Criminals and guns don't mix. To many innocent lives have been taken. The NRA is not what it use to be. We are disappointed in our government and lawmakers. We don't feel safe anywhere anymore. Children don't feel safe in schools anymore. To many guns out there. There are no gun laws and people can do whatever they want why is that? How are we suppose to feel safe? How are our children suppose to feel safe? This all has gotten way out of control. We are feel upset, angry and frustrated. Why are you letting the NRA get away with this? We are looking out for the families that lost loved ones from these shootings. We all would like answers now. We all would like the truth now. We don't live in a safe America anymore. We need laws that work. We need strict gun laws now. To many shootings going on. No one seems to care anymore why is that? We will keep making noise until things change. People need to feel safe in parking lots, churchs, play grounds, malls, stores, movie theatres, parks and anywhere else we are at. This has been a huge issue now. Nothing is being done to protect families, schools and everyday people. We all would like to know where these guns are coming from. Is this to much to ask?

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 4:17 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942w-vv23
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1285

Public Comment 1058. Individual. William Baker. 7-4-18

---

## Submitter Information

**Name:** William Baker

**Address:**

9013 Natalie Ave. NE

Albuquerque, 87111

**Email:** wmchbaker@gmail.com

**Phone:** 5052960198

**Fax:** 87111

---

## General Comment

I am appalled at the idea of removing regulation of firearms exports, which would be the practical effect of having the Commerce Department "regulate" firearms sales. This opens the door to gun purchases by terrorists and repressive regimes, with no congressional oversight. Selling weapons to terrorists is a dumb way for gun manufacturers to make a buck, but obviously that's all they care about.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 4:18 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942w-2rzk
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1286

Public Comment 1059. Individual. Edh Stanley. 7-4-18

---

## Submitter Information

**Name:** Edh Stanley

**Address:**

Sacramento, CA, 95823-1457

**Email:** itsEdh@softcom.net

**Phone:** 9164279095

---

## General Comment

I think Congress should know when large numbers of weapons are sold.



# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 4:18 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942w-q0pc
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1287

Public Comment 1060. Individual. David Benson. 7-4-18

---

## Submitter Information

**Name:** David Benson

**Address:**

725 NE Illinois Street  
Pullman, WA, 99163

**Email:** davidbernardbenson@gmail.com

---

## General Comment

I strenuously oppose this proposed rule change.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 4:19 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942w-ibr1
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1288

Public Comment 1061. Individual. Timothy Beitel. 7-4-18

---

## Submitter Information

**Name:** Timothy Beitel

---

## General Comment

I will say this again because it is important and it bears repeating, I oppose this change in the rules that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Please dont do this, we should be trying to make things better not worse.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 4:20 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942w-eeq1
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1289

Public Comment 1062. Individual. Donald Goldhamer. 7-4-18

---

## Submitter Information

**Name:** Donald Goldhamer

---

## General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

Firearms are not mere commodities and the Commerce Department is unequipped to properly control their movement.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 4:21 PM <b>Received:</b> July 04, 2018 <b>Status:</b> Posted <b>Posted:</b> July 16, 2018 <b>Tracking No.</b> 1k2-942w-ov1v <b>Comments Due:</b> July 09, 2018 <b>Submission Type:</b> Web
--

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1290

Public Comment 1063. Individual. Fred Clarke. 7-4-18

---

## Submitter Information

**Name:** Fred Clarke

**Address:**

1007 Rosa Parks Blvd Row 8.9n

Nashville, 37208

**Email:** photozen@gmail.com

---

## General Comment

The situation in the US is not normal, compared to all the other industrialised nations, it is almost primitive. the fact you have to have a gun in the US reflects on the US being an unsafe and unstable country. more guns is not an answer, rather just adding to the escalating problem of gun violence and gun deaths in the US. This problem is partly due to the accessibility of massive numbers of firearms in the US but also the mentality of the US population. The imperialistic nature of the US is also ingrained in the mentality of its own population, not just the government. it is generally manufactured fear, fear the is used to justify many things in the US. It is definitely a cultural thing. The 2nd amendment is constantly being misrepresented as well. thx

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 4:21 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942x-oeo5
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1291

Public Comment 1064. Individual. Elizabeth Schroder. 7-4-18

---

## Submitter Information

**Name:** Elizabeth Schroder

---

## General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less! The Commerce Department just does not have the resources to adequately enforce export controls. I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 4:22 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942x-5mzf
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1292

Public Comment 1065. Anonymous. 7-4-18

---

## Submitter Information

**Name:** Anonymous Anonymous

---

## General Comment

Trump & the NRA want to sell more guns, especially exports. They want it to be easier to export guns.

Guns are lethal weapons & are dangerous. There should be more regulations & controls, not less.

Therefore, I oppose the rule change that would switch the regulation of firearm exports from the US State Department to the US Commerce Department. The Commerce Dept is ill-equipped to handle the process.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 4:23 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942x-pm57
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1293

Public Comment 1066. Individual. J.T. Smith. 7-4-18

---

## Submitter Information

**Name:** J.T. Smith

**Address:**

Sellersville, PA, 18960

**Email:** ace910046scal@hotmail.com

**Phone:** 2672814056

---

## General Comment

Reality check: Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to far more controls, not less!

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 4:23 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942x-wjt7
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1294

Public Comment 1067. Individual. Cynthia Mastro. 7-4-18

---

## Submitter Information

**Name:** Cynthia Mastro

---

## General Comment

I oppose a rule change that would allow the Dept. of Commerce to regulate arms shipments.



# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 4:24 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942x-c6ig
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1295

Public Comment 1068. Individual. Michael Dinowitz. 7-4-18

---

## Submitter Information

**Name:** Michael Dinowitz

**Address:**

23 Meadow Ave  
Medford, NY, 11763

**Email:** mdinowit@hotmail.com

**Phone:** 6318032678

**Fax:** 11763

---

## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This transfer does almost nothing for the citizen while creating opportunity for industrial profit for the firearms industry and NRA. It also removes Congressional ability to oversee and help regulate fire arms sales.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

This rule change must be opposed and defeated for the safety of all people both in the US and the world.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 4:25 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942x-s2qe
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1296

Public Comment 1069. Anonymous. 7-4-18

---

## Submitter Information

**Name:** anonymous Anonymous

---

## General Comment

I am very concerned with proposed legislation to change the control of exporting firearms from the State Department to the Commerce Department. Some of the egregious effects would be:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe

Most Sincerely

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 4:26 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942y-73yk
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1297

Public Comment 1070. Individual. Tara Poelzing. 7-4-18

---

## Submitter Information

**Name:** Tara Poelzing

**Address:**

Roanoke, VA, 24015

**Email:** tarapoelzing@yahoo.com

**Phone:** 5406823870

---

## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

The State Department focuses on safeguarding our nation while the Commerce Department focuses primarily on promoting business.

In the case of firearms, safety should come first and foremost. The potential to move more weapons in the hands of additional dangerous people and regimes must be considered and immediately addressed. This is the first and easiest step to avoid that situation. Oppose the rule change!

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 4:35 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942y-g79w
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1298

Public Comment 1071. Individual. Carlos Cunha. 7-4-18

---

## Submitter Information

**Name:** Carlos Cunha

---

## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It is clear that one of the reasons Mexico is having so many problems is because of the outflow of American firearms to the country. This rule change will facilitate the process in Mexico and other countries leading to more crime and more immigrants fleeing to the US:.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 4:36 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942y-p57q
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1299

Public Comment 1072. Individual. Gavi Stevens. 7-4-18

---

## Submitter Information

**Name:** Gavi Stevens

---

## General Comment

So now the NRA is trying to dictate foreign policy for our government and what to sell overseas. That is just how arrogant they are and how much they think they control this administration and Congress. This overreach by an organization that has grown into one that tries to control governments from the local to the national has to be stopped before they become the puppet master of our country. We can't allow an organization whose sole purpose is to put lethal weapons into the hands of as many people as possible to dictate policy to our leaders. Allowing increased exporting of assault weapons overseas just means that more insurgents will be using those weapons against us, our military forces and our allies forces, causing that many more deaths and injuries. Is that what you want to be known for? Allowing those young men to die or be wounded unnecessarily just to benefit one organization's lust for power? I can only hope not.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 4:37 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942y-4xqs
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1300

Public Comment 1073. Individual. Mary Kuck. 7-4-18

---

## Submitter Information

**Name:** Mary Kuck

---

## General Comment

I strongly oppose the above proposed rule. Having lived in the Caribbean for 23 years, I have seen what the influx of illegal weapons has done to destabilize governments. If anyone can buy these legally, we will exacerbate our contribution to the violence that is sending immigrants out of their homes into our country as a last resort for finding safety.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

This change should never take place.

Thank you, Mary Kuck

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 4:38 PM <b>Received:</b> July 04, 2018 <b>Status:</b> Posted <b>Posted:</b> July 16, 2018 <b>Tracking No.</b> 1k2-942y-9c5w <b>Comments Due:</b> July 09, 2018 <b>Submission Type:</b> Web
--

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1301

Public Comment 1074. Individual. Margaret Heatherly. 7-4-18

---

## Submitter Information

**Name:** Margaret Heatherly

**Address:**

10 Wayne Drive  
Taylors, SC, 29687

**Email:** tth42@gmx.com

**Phone:** 8643228620

**Fax:** 29687

---

## General Comment

You want more unregulated weapons to kill men, women and children. You want more unregulated weapons to cause death and destruction? You more more unregulated weapons to destabilize the world? You want more unregulated weapons to make it harder for everyone?

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 4:38 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942y-wos5
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1302

Public Comment 1075. Individual. M Hewitt. 7-4-18

---

## Submitter Information

**Name:** M Hewitt

---

## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Stop the nonsensical proliferation of weapons!



# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 4:41 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942y-gnri
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1303

Public Comment 1076. Anonymous. 7-4-18

---

## Submitter Information

**Name:** Anonymous Anonymous

**Address:** United States,

---

## General Comment

I oppose allowing the Commerce Department to have any thing to do with selling firearms to any foriegn country.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 4:42 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942y-2yjb
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1304

Public Comment 1077. Anonymous. 7-4-18

---

## Submitter Information

**Name:** Anonymous Anonymous

---

## General Comment

I had been under the impression that this administration was against foreign terrorists and foreign criminals who could hurt American citizens. Deregulating weapons sales to foreign buyers makes America less safe. Part of the mess in Afghanistan was because they had weapons we sold them when we were trying to take out the USSR. Then voila, Taliban!

Because we have legal gun ownership in this country, we have a very active market for guns and American-made weaponry is very high quality. Do we really want it to be easy for those weapons to get in the hands of the next Osama bin Laden?

Oh, I see. Obama killed bin Laden, therefore bin Laden must not have been that bad, and we should encourage more terrorists to continue erasing Obama's legacy. Because MAGA means Make America Vulnerable Again, right?

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 4:43 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942z-mwed
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1305

Public Comment 1078. Individual. Carolyn Dipboye. 7-4-18

---

## Submitter Information

**Name:** Carolyn Dipboye

---

## General Comment

I am extremely. extremely opposed to moving oversight of export of weapons from the State Department to the Commerce Department. Given the situation in our own country and the situation in Mexico and Central American countries due to lax regulation on firearms in our country, this is exactly the wrong move in that it would enable the acceleration of gun violence. I strongly urge you to resist this move. We are at a time when more effective regulation on firearms is critical. We are not at a point where making more money on guns could possibly be beneficial to anyone other than the manufacturers. Please resist this change!

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 4:43 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942z-u8ty
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1306

Public Comment 1079. Individual. Rebecca Anonymous. 7-4-18

---

## Submitter Information

**Name:** Rebecca Anonymous

---

## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less! Do not let the NRA run OUR government for gun manufacturers profit.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 4:44 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942z-uqa0
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1307

Public Comment 1080. Individual. Louise Backer. 7-4-18

---

## Submitter Information

**Name:** Louise Backer

---

## General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

The rule change would make the world a far more dangerous place because:

1. It would eliminate the State Departments Blue Lantern program which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms and enable 3D printing of firearms in the U.S. and around the globe.

Firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

We dont need more guns in the world or in the United States. We need more oversight to make sure the wrong people dont obtain guns and ammunition.

Why are we helping the US gun industry [NRA] with this proposed change? They should not be the ones to benefit at the incredible expense of innocent peoples safety.

This is morally wrong and unethical. Please do not make the rule change. Do not be beholden to the NRA and the gun industry just because they want to fill their pockets with the profits from the sales. Think of the innocent people who would be impacted adversely.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 4:45 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942z-bdyt
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant  
Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant  
Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1308

Public Comment 1081. Individual. Mary Beach. 7-4-18

---

## Submitter Information

**Name:** Mary Beach

**Address:**

133 W. Cuyahoga Falls Ave  
Akron, OH, 44310

**Email:** beachmaryann@yahoo.com

**Phone:** 3306343075

---

## General Comment

I am writing to express my opposition to moving the oversight of international weapon sales from the State Department to the Commerce Department. Thank you.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 4:45 PM <b>Received:</b> July 04, 2018 <b>Status:</b> Posted <b>Posted:</b> July 16, 2018 <b>Tracking No.</b> 1k2-942z-kwfc <b>Comments Due:</b> July 09, 2018 <b>Submission Type:</b> Web
--

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1309

Public Comment 1082. Individual. Jessica Roeder. 7-4-18

---

## Submitter Information

**Name:** Jessica Roeder

---

## General Comment

I oppose moving the regulation of firearms exports from the State Department to the Commerce Department. Doing so would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents such as organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. This change is not in the best interest of our people, or anyone's people.

One detail about the change: the removal of the ban on the 3D-printing of firearms is simply not acceptable.

Please reject this change.



# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 4:46 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942z-809t
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1310

Public Comment 1083. Individual. Alisa Schlacht. 7-4-18

---

## Submitter Information

**Name:** Alisa Schlacht

---

## General Comment

I am writing to implore you to prevent the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The United States should be a beacon of light for freedom and justice in the world, not a global supplier of weapons to increase brutality and human suffering. The U.S. Commerce Department should not be responsible for spreading murderous weapons around the world, which will undoubtedly end up being used cruelly against innocent people and likely against Americans as well.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 4:47 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942z-vdbe
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1311

Public Comment 1084. Individual. LeeAnn Chastain. 7-4-18

---

## Submitter Information

**Name:** LeeAnn Chastain

---

## General Comment

I oppose switching the regulation and exportation of any and all arms from the U.S. Department of State to the Department of Commerce. Such a move would enable the criminal elements in a society to exert even greater power over the law-abiding populations and increase person-to-person crime anywhere such guns are sold.

We must deal with the current problems we have in this country with daily senseless gun deaths and mass shootings and not export our arms and ammunition to other nations. In addition, we would be providing arms to criminal or terrorist elements that also wish us harm, and greater violence against our troops or people abroad would likely be carried out.

The U.S. State Department is much better suited to continue this role than the Commerce Department, which would seek profits for gun manufacturers anywhere and everywhere.

Please oppose this change and continue to carefully regulate any sale and export of guns and ammunition.

Thank you.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 4:47 PM <b>Received:</b> July 04, 2018 <b>Status:</b> Posted <b>Posted:</b> July 16, 2018 <b>Tracking No.</b> 1k2-942z-xn7a <b>Comments Due:</b> July 09, 2018 <b>Submission Type:</b> Web
--

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1312

Public Comment 1085. Individual. John J Paulhus. 7-4-18

---

## Submitter Information

**Name:** John J Paulhus

---

## General Comment

Foolish to change the regulation of firearms exports to Commerce. Don't do it.

# PUBLIC SUBMISSION

<b>As of:</b> 7/16/18 4:48 PM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 16, 2018
<b>Tracking No.</b> 1k2-942z-s9ns
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1313

Public Comment 1086. Anonymous. 7-4-18

---

## Submitter Information

**Name:** Anonymous Anonymous

---

## General Comment

Our family (from Ohio) opposes the proposed rule change to transfer firearms export regulations from the State Department to the Commerce Department. This is unnecessary government fiddling, and dangerous for America. Being driven by business interests (including the NRA and those who profit from arms sales), there is no reason for doing this that would be in the interest of the US or our security -- both national and international. The Commerce Department is ill-equipped to handle arms exports, making the US vulnerable to traffickers, criminals, and terrorists, and poorly or unregulated arms exportation could also lead to instability elsewhere, eventually building negative backlash for our country. (We already see the mass-migration problems formed partly from some of our foreign policies which now we can learn from or anticipate -- this is such a case.) There is simply no reason to make this change (except for profit for a small cadre of people), and many, many reasons not to do so that (which benefit the entire country). In sum, this is reckless and unnecessary, and it would create cost to American taxpayers for infrastructure changes that would be profligate and irresponsible.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:11 AM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-942z-e0uw
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1401

Public Comment 1087. Individual. Judy Landress. 7-4-18

---

## Submitter Information

**Name:** Judy Landress

---

## General Comment

I strongly Oppose a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

The rule change would make the world a far more dangerous place.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:12 AM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-942z-m92q
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1403

Public Comment 1088. Individual. Pete Sandifer. 7-4-18

---

## Submitter Information

**Name:** Pete Sandifer

**Address:**

408 Pecan tree dr.

Montgomery, AL, 36109

**Email:** sparrowhawk5@charter.net

**Phone:** 3342729725

---

## General Comment

Haven't we/ you seen enough school /work carnage? It's time to register all. Any with history of abuse or mental instability need not apply...

Of coerce having dishonorable discharged ex- Col. as leader of the NRA. Doesn't bode well for keeping criminals out of gun control.

Please make common sense Laws!

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:13 AM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-942z-hjmi
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1406

Public Comment 1089. Individual. Laurie Azzoto. 7-4-18

---

## Submitter Information

**Name:** Laurie Azzoto

**Address:**

4212 Pisces Circle  
Liverpool, NY, 13090

**Email:** azzoto@aol.com

**Phone:** 3159999999

**Fax:** 13090

---

## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Guns don;t belong in the hands of just anyone.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:13 AM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-942z-j8os
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1407

Public Comment 1090. Individual. Carol Kussart. 7-4-18

---

## Submitter Information

**Name:** Carol Kussart

**Address:**

12129 Angle Crossing Rd

Cerro Gordo, IL, 61818

**Email:** ckussart@gmail.com

**Phone:** 2178553258

---

## General Comment

I oppose this rule change that would move the regulation of the export of firearms from the State Department to the Commerce Department. These weapons are military weapons and should remain that way. This move would eliminate the State Department's inspection program and public reporting. It would also remove licensing requirements for brokers which would very likely cause more trafficking, and it would remove the State Department's block on 3D printing of firearms. Congress would also have no oversight ability under this move. Therefore, the world would be less safe. I see this rule change as benefiting gun manufacturers only--there is no other benefit to this change. Keep the regulations where they belong--with the State Department.



# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:18 AM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-942z-u94l
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1413

Public Comment 1091. Individual. Dwan Dorman. 7-4-18

---

## Submitter Information

**Name:** Dwan Dorman

---

## General Comment

I oppose the rule change to switch regulation of firearms exports from the U.S. State Department to the U.S. Commerce Department. This is dangerous on many levels.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:19 AM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-942z-6zw0
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1414

Public Comment 1092. Individual. Margaret Baum. 7-4-18

---

## Submitter Information

**Name:** Margaret Baum

**Address:**

248 sunset dr  
Wilmette, IL, 60091

---

## General Comment

oppose the proposed rule change that would declassify firearms as military and move the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Firearms are weapons, no matter how much organizations may want to call guns sport accessories , and are used to kill people. Moving the regulation of firearms exports from the State Department to the Commerce Department would make firearms exports to dangerous and autocratic regimes easier, remove safeguards that help keep agents like organized crime and terrorist organizations from getting weapons, and further fuel violence that destabilizes countries and causes mass migration. Firearms and weapons exports need more controls and export licensing requirements, not less. Government should not sell out to dangerous business interests that work against public safety interests. I Oppose this proposal.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:20 AM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-942z-v6hh
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1416

Public Comment 1093. Individual. Grady Warren. 7-4-18

---

## Submitter Information

**Name:** Grady Warren

---

## General Comment

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business).[1] This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:21 AM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-942z-se77
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1418

Public Comment 1094. Individual. Chris Kermiet. 7-4-18

---

## Submitter Information

**Name:** Chris Kermiet

**Address:**

2267 Hudson St.  
Denver, CO, 80207

---

## General Comment

Moving the handling of export licenses of semiautomatic assault weapons and other firearms from the U.S. State Department ( to the U.S. Commerce Department is a truly dumb idea. Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

This appears to be a move by the gun manufacturers to sell more guns with less oversight. I'm strongly opposed to this.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:21 AM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-942z-z075
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1420

Public Comment 1095. Individual. Julia Bumbaugh-Shah. 7-4-187

---

## Submitter Information

**Name:** Julia Bumbaugh-Shah

**Address:**

1 S Lancaster Lane  
Newtown, PA, 18940

---

## General Comment

Right now, firearms exports are classified as military. These exports should stay under the regulation of the State Department, so that Congress can block sales of large batches of firearms to foreign countries with serious human rights concerns and be automatically informed about sizable weapons sales that it could stop in the name of national security.

The Commerce Department does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. Firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:22 AM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9430-a7a4
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1422

Public Comment 1096. Individual. Katy Reddick. 7-4-18

---

## Submitter Information

**Name:** Katy Reddick

**Address:**

50 Cherry Lane

Durham, CT, 06422

**Email:** katyganino@yahoo.com

---

## General Comment

I oppose any change of regulations that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business).[1] This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. These are military grade weapons and must be regulated as such.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:23 AM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9430-k7nd
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1423

Public Comment 1097. Individual. Susan Kute. 7-4-18

---

## Submitter Information

**Name:** Susan Kute

**Address:**

2338

Carolina Ave

Louisville, KY, 40205

**Phone:** 5025339487

---

## General Comment

Keep control of shipments of firearms under control of State Department.

Please keep the strongest regulations on gun sales to all countries.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!



# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:24 AM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9430-vozj
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1424

Public Comment 1098. Anonymous. 7-4-18

---

## Submitter Information

**Name:** Anonymous Anonymous

---

## General Comment

I believe the State Department should retain regulatory control over the export of munitions. Shifting these munitions sales to Commerce Department oversight will result in these weapons getting into the hands of terrorists.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:24 AM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9430-6c6o
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1425

Public Comment 1099. Individual. Stephen Weissman. 7-4-18

---

## Submitter Information

**Name:** Stephen Weissman

**Address:**

434 Gorman Bridge Rd

Asheville, NC, 28806

**Email:** sweissman4@gmail.com

**Phone:** 828-255-5602

---

## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Having such exports under the Commerce Department would remove many of the controls which limit massive firearms sales overseas. It would allow 3-D printers to export patterns for firearms.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:25 AM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9430-xx73
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1426

Public Comment 1100. Individual. Debra whalen. 7-4-18

---

## Submitter Information

**Name:** Debra whalen

---

## General Comment

firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries

[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security. This would be a dangerous precedence. Do not change this law.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:26 AM <b>Received:</b> July 04, 2018 <b>Status:</b> Posted <b>Posted:</b> July 17, 2018 <b>Tracking No.</b> 1k2-9430-f9yd <b>Comments Due:</b> July 09, 2018 <b>Submission Type:</b> Web
--

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1427

Public Comment 1101. Individual. Sharon Teagardin. 7-4-18

---

## Submitter Information

**Name:** Sharon Teagardin

**Address:**

addieteagardin@mac.com

4

Indianapolis, 46227

**Email:** addieteagardin@mac.com

**Phone:** 3176963046

**Fax:** 46227

---

## General Comment

The American people have made it clear that we are opposed to guns, particularly semi-automatics. Do your job and listen to the will of the people.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:27 AM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9430-b92m
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1428

Public Comment 1102. Individual. Caren Flashner. 7-4-18

---

## Submitter Information

**Name:** Caren Flashner

---

## General Comment

I oppose the rule change that would switch the regulation of firearms export from the State Dept. to the Commerce Dept. I believe the State Dept. better protects the American people, whereas the Commerce Dept. wants to aid businesses in selling as many guns as possible, regardless of where and to whom.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:27 AM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9430-yjqp
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1429

Public Comment 1103. Individual. Matthew Genaze. 7-4-18

---

## Submitter Information

**Name:** Matthew Genaze

**Address:**

334 Harvard Street  
Cambridge, MA, 02139

**Email:** aquarover@hotmail.com

---

## General Comment

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

Here are more details on how the rule change would make the world a far more dangerous place:

- It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- It would remove licensing requirements for brokers, increasing the risk of trafficking.
- It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Guns are an epidemic. Guns are a daily act of terrorism. Guns are a direct threat to our democracy. These facts require direct and significant action immediately. I am only able to support legislators and the parties they are members of that support aggressive gun regulation legislation.

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:28 AM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9430-uzxu
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1430

Public Comment 1104. Individual. Susan Chandler. 7-4-18

---

## Submitter Information

**Name:** Susan Chandler

**Address:**

3008 N 25th St  
Fort Pierce, FL, 34946

---

## General Comment

We already have endured many instances in which our firearms were used by foreign nationals to kill our troops. We have also witnessed our firearms being used by terrorists, drug traffickers and extremist regimes to take innocent lives.

Although they haven't done a stellar job of safeguarding our soldiers or civilian populations, the Department of State must maintain control of international firearms sales, and foreign firearms sales must remain classified as "military" ... the Department of Commerce has no resources to even begin to measure the monumental risks involved in weapons export.

No matter how many people support this change, it must not be made.



# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:29 AM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9430-ui2l
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1431

Public Comment 1105. Individual. Bunny Music. 7-4-18

---

## Submitter Information

**Name:** Bunny Music

**Address:**

20B Clove Avenue

Sussex, NJ, 07461

**Email:** bunny.music@gmail.com

---

## General Comment

Are you freaking kidding me? We don't have enough guns in this country? Get smart and at least ban assault weapons.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:30 AM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9430-qu6l
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1432

Public Comment 1106. Individual. Erika Olson. 7-4-18

---

## Submitter Information

**Name:** Erika Olson

**Address:** United States,

**Email:** eolson@mba2003.hbs.edu

---

## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

I cannot believe this is even being considered. Guns and firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations.

If anything we need MORE oversight and controls, not less!

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:31 AM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9430-87tl
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1433

Public Comment 1107. Individual. Alisa Norquist. 7-4-18

---

## Submitter Information

**Name:** Alisa Norquist

---

## General Comment

Please do not move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:33 AM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9430-jgrh
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1436

Public Comment 1108. Individual. Dustin Weinberger. 7-4-18

---

## Submitter Information

**Name:** Dustin Weinberger

---

## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

If anything we need additional oversight and this change would drastically weaken oversight.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:37 AM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9430-s7m2
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1439

Public Comment 1109. Individual. J Ebby. 7-4-18

---

## Submitter Information

**Name:** J Ebby

---

## General Comment

I write today to state my opposition to moving the regulation of firearms exports from the State Department to the Commerce Department.

Such change would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and contributes to mass migration.

- It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

- It would remove licensing requirements for brokers, increasing the risk of trafficking.

- It would remove the State Departments block on the 3D printing of firearms, effectively enabling 3D printing of firearms in the U.S. and around the globe.

The State Department has shown itself to be well equipped to perform this strategically important function. Together with Congress, it is in a unique position to thus protect this great nation from harm to national security that can result from large batch firearms sales to foreign countries.

There is nothing broken that could possibly be fixed by the moving the regulation of firearms exports from the State Department to the Commerce Department.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:38 AM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9430-k7lx
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1441

Public Comment 1110. Anonymous. 7-4-18

---

## Submitter Information

**Name:** Anonymous Anonymous

---

## General Comment

I oppose this!

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:38 AM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9430-9y6w
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1442

Public Comment 1111. Individual. Raymond Valinoti, Jr.. 7-4-18

---

## Submitter Information

**Name:** Raymond Valinoti, Jr.

---

## General Comment

I received this disturbing message from MomsRising.org in my email. I agree with this organization about this:

"The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business)...] This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

"HERES THE LOW DOWN: Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries...] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

"Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

"The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration."

PLEASE, for the sake of America and the rest of the world, OPPOSE this rule change!



# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:39 AM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9430-k5q6
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1443

Public Comment 1112. Individual. Linda Novenski. 7-4-18

---

## Submitter Information

**Name:** Linda Novenski

---

## General Comment

I am strongly opposed to the unbridled commercialization of weapons sales. Our national security must not be bypassed by weapons manufacturers and arms dealers intent on boosting their sales wherever they can find buyers. It is bad enough right now, but removing the last vestige of US Dept of State control means uncontrolled flows of military weapons to the highest bidder.

Profits are not the only factor to consider here. Our national security, and security of our citizens around the world, are at stake. Keep international traffic in arms under the control of the U.S. Department of State.

Sincerely,  
Linda Novenski

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:40 AM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9430-a59f
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1444

Public Comment 1113. Individual. Mike Sudalnik. 7-4-18

---

## Submitter Information

**Name:** Mike Sudalnik

**Address:**

7810 E. Lamont Rd.

Argyle, WI, 53504

**Email:** mikensue@wildblue.net

**Phone:** 6085433729

---

## General Comment

This RULE would DESTROY any control of arms sales by Agencies( Congress,State Department,etc.) and hand off this responsibility to an agency( Commerce), that has MEAGER ABILITY, INSUFFICIENT PERSONNEL , and a mind set 180 degrees in opposition to NATIONAL SAFETY! "IF they have the cash..they get the guns.." this would be their maxim..a formula any GANGSTER, revolutionary, terrorist, etc. would love! Totally UNACCEPTABLE!

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:41 AM
<b>Received:</b> July 04, 2018
<b>Status:</b> Posted
<b>Posted:</b> July 17, 2018
<b>Tracking No.</b> 1k2-9430-gc6p
<b>Comments Due:</b> July 09, 2018
<b>Submission Type:</b> Web

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1445

Public Comment 1114. Individual. Laura Carroll. 7-4-18

---

## Submitter Information

**Name:** Laura Carroll

**Address:**

9511 Saginaw st  
Silver spring, MD, 20901

**Email:** Tomc61@verizon.net

**Phone:** 301-589-3359

---

## General Comment

Please do not make this change! We need more oversight  
Of gun trafficking not less. Do we really want to unleash  
3D printed guns in the world? Do we really want to allow  
Guns to be sold to oppressive governments? Sounds like  
Oliver North learned nothing from his Iran contra days.  
Look our president has continually expressed sympathy  
And alignment its brutal dictators: kim jung un, Duarte,  
And Putin to name a few. This is not what Americans  
Want to be known for. We stand for freedom. Please do  
Not take this action.

# PUBLIC SUBMISSION

<b>As of:</b> 7/17/18 9:41 AM <b>Received:</b> July 04, 2018 <b>Status:</b> Posted <b>Posted:</b> July 17, 2018 <b>Tracking No.</b> 1k2-9430-vzju <b>Comments Due:</b> July 09, 2018 <b>Submission Type:</b> Web
--

**Docket:** BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Comment On:** BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

**Document:** BIS-2017-0004-1446

Public Comment 1115. Individual. q q. 7-4-18

---

## Submitter Information

**Name:** q q

---

## General Comment

close the loopholes, make background checks obligatory, control the distribution, ban bump stocks