



# ATF Association

October 12, 2017

Representative Carlos Curbelo  
U.S. House of Representatives  
1404 Longworth H.O.B.  
Washington DC 20515

Representative Curbelo;

The ATF Association consists of current and former employees of the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and is supported by organizations and citizens across the country. Recently, some have attempted to cast blame on ATF for not banning devices like the “bump slide” used in the Las Vegas shootings. We would like to clarify this confusing issue to protect honorable ATF employees from false allegations that they chose to make this item legal when it was the law that prohibited them from regulating the item. We also hope this information will assist you in a better understanding of this issue.

The National Firearms Act of 1934, Title 26 U.S.C. 5845(b) defines a “machine gun” as any combination of parts designed and intended for use in converting a weapon **to shoot automatically more than one shot**, without manual reloading, **by a single function of the trigger**. ATF also holds that any item that can cause a firearm to fire more than one shot by the single function of the trigger is also regulated as a machine gun.

The Las Vegas killer used a “bump slide” accessory that attaches to the stock of a semi-automatic rifle and enhances the rate at which the shooter can pull the trigger on the firearm. This increases the rate of fire close to that of an actual machine gun. **However, under the current law, it does not make it a machine gun.**

The **bump slide**, and several other similar after-market accessories that increase the rate at which a shooter can pull the trigger, are **engineered to avoid regulation under Federal law**. These accessories DO NOT cause the firearm to shoot more than one shot by the single function of a trigger pull. The notion that ATF chose not to regulate an item it had the authority to regulate is false. **The law is very clear and it does not currently allow ATF to regulate such accessories.**

In the past, ATF has reviewed accessories that DID cause a semi-automatic rifle or pistol to fire more than one shot with a single pull of the trigger, such as the Lightning Link, the Atkins Accelerator and other “Drop in Sears” which cause semi-automatic rifles to function as machine guns. ATF makes rulings based on the statutory authority contained in law and **cannot change the law** to add new accessories that do not fall within the scope of existing law. A link to many of these ATF rulings can be found at the following link: <https://www.atf.gov/firearms/docs/atf-national-firearms-act-handbook-appendix-b/download>

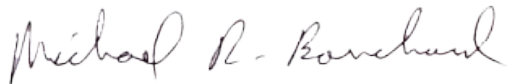
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If it is determined that bump slides and similar devices should be regulated, one way it could be accomplished is to support adding a new category to the National Firearms Act of 1934 allowing for the regulation of “multi-burst trigger activators”. California and New York already regulate such items. The new category of Federal law would encompass other accessories on the market that make semi-automatic rifles fire like a machine gun but are engineered in a way to avoid regulation under current Federal law. These are commonly available for sale in firearms stores and on websites such as [Rapidfiretriggers.net](http://Rapidfiretriggers.net) and [Rockinlock.com](http://Rockinlock.com).

We hope you will support legislation to regulate these multi-burst trigger activators. As noted, the National Firearms Act of 1934 works well with the items that it regulates. We also hope you will not allow the honorable employees of ATF, who followed existing law in their bump stock ruling, to be falsely accused of not doing their job by those who seek to exploit the situation for political gain.

Thank you for your time and attention. I look forward to your response.

Sincerely,

A handwritten signature in cursive script that reads "Michael R. Bouchard". The ink is dark and the handwriting is fluid and legible.

Michael R. Bouchard  
President, ATFA