Dear Mr. Hawbaker,

This is in reference to your latest correspondence to FTB, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), which is accompanied by an AR-type firearm in which AR-15 pattern fire-control components are installed (see enclosed photos). Your item was submitted in response to FTB letter #2012-683-RS, which provided our evaluation of the last sample of your proposed trigger device. Although we informed you in letter #2012-683 that FTB had classified this device as a "machinized" per 26 U.S.C. §584(a), we indicated that our Branch would evaluate it again if you could redesign your trigger device to incorporate a positive disconnector mechanism.

The current sample examined by FTB consists of a modified trigger device (assembly) for an AR-15 pattern firearm. This assembly is designed to allow the trigger to be fixed when the trigger is pulled, and another shot when the trigger is released. Further, we found that the device selector has not been machined to enable the trigger to be pulled further than a modified selector would allow the trigger to be pulled. Additionally, FTB observed that material on the top and bottom portion of the hammer has been removed, and it is clear that this device was not designed to incorporate a shaft which adjusts the position of the disconnector relative to the trigger. Additionally, FTB observed that material on the top and bottom portion of the hammer has been removed, and our evaluation also disclosed that there is an additional "disconnector" located directly behind the primary disconnector. This "secondary" disconnector enables the hammer to be held positively to rear, prior to the release of trigger, for the "release shot."

To determine its two modes of operation, FTB first performed a manual function test on the submitted sample in its "normal mode" with the device selector placed in its "12 o'clock position." This test disclosed that the submitted sample would function as an un-modified semiautomatic AR-type firearm.

Sincerely yours,

Chief, Firearms Technology Branch

Enclosure