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Potential Issues Related to Implementation of UN Firearms Marking and Tracing Protocols
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Thank you Mr. Chairman.

My name is Richard Patterson and I'm the Managing Director of the Sporting Arms and Ammunition Manufacturers' Institute, also known as SAAMI. I appreciate the opportunity to address the implementation of protocols for marking and tracing of firearms. Since its founding in 1926 at the request of the US government, SAAMI has created the technical standards for safety and reliability in the design, manufacture, transportation, storage and use of firearms, ammunition and components.

We fully support legitimate law enforcement efforts to trace firearms used in crimes in a timely manner. SAAMI—and the major firearms manufacturers in the United States—are proud of the Access 2000 computer system we developed to allow the Bureau of Alcohol, Tobacco, Firearms and Explosives (BATFE) virtually instant, 24 hour a day/7 day a week tracing of a manufacturers' firearm sales. The key information required on a firearm to make this—or any—trace accurate and efficient is simple: you need the name of the manufacturer, an address, and the serial number. This information needs to be on a single part—the frame (also known as the receiver). Any other information is superfluous, inefficient, and may inhibit or even prohibit effective tracing of a firearm. For instance, putting a serial number on more than one part of the firearm is particularly problematic. The firearms industry was the pioneer in mass production techniques, which means parts are interchangeable (one of the 1926 charters of SAAMI was to ensure interchangeability). The frame, or receiver, is the part that every other part attaches to. This is the part that should be marked. Barrels, trigger groups and grips can be and are easily switched. Let's say a regulation requires marking of the frame, the barrel and the trigger group. Then parts are switched or replaced—which is a common practice to get a replacement for a worn barrel or a more precise target trigger on the firearm. You now have a firearm with three different serial numbers from three different sources. Who do you contact for the trace? Which serial number is the right one? Similarly, if a firearm is marked with the country and year of import what happens when—that same year—a manufacturer or distributor transfers a firearm from a country with a weaker economy to one with a stronger economy where it will sell faster? The firearm now has two country codes with the same year of import. Which is the right one?

These are two examples of unintended consequences of well-intentioned but mis-informed regulations. We applaud the efforts to use a single serial number as the best way to implement the intent of the UN instrument on marking and tracing's import marking requirement. We feel this will best maintain the integrity of the marking and tracing system and allow the most efficient and effective use of law enforcement time and resources.

Of course it's not just what is marked and with what information, it's how these regulations are implemented which will make or break any system. We have seen depth and width requirements proposed that are technologically unfeasible. Marking heat-treated metal is not easy to accomplish. It is not a simple case of striking a die with a hammer to transfer the mark to the metal. Such a superficial mark would be too easily defeated by criminals. Based on our technical knowledge and practical experience, we see several potential technical roadblocks to effective marking—and therefore tracing—of firearms. These potential technical problems fall into four broad categories: technical challenges, aesthetic challenges, logistical challenges, and actual benefits. I do not have the time to bore you with the technical details. This information is available in our paper which is being distributed. I ask that you review this paper and feel free to contact me to discuss any of the technical problems.

Let me conclude by making it clear—SAAMI believes that marking and tracing of firearms is an important law enforcement tool. We support efficient tracing via the existing regulations requiring the manufacturer's name, address, and a unique serial number on every firearm's frame (receiver). This system has been proven to be a successful law enforcement tool in the United States since 1968. Regulations that require additional markings, or markings on multiple parts is irrelevant as a law enforcement tool—and may even create additional confusion that would hamper law enforcement efforts. Any inappropriate additional marking requirement creates many negative unintended consequences and should therefore be avoided.

And finally, the way the firearm mark is defined has significant safety, cost, and quality implications.

We gladly offer our information and expertise to any and every government to help with the effective and efficient tracing of firearms as a legitimate law enforcement tool.

Thank you!