

United States Department of Justice
Bureau of Alcohol, Tobacco, Firearms and Explosives

Inspections of Licensed Importers and Manufacturers



Firearms Import/Export Conference

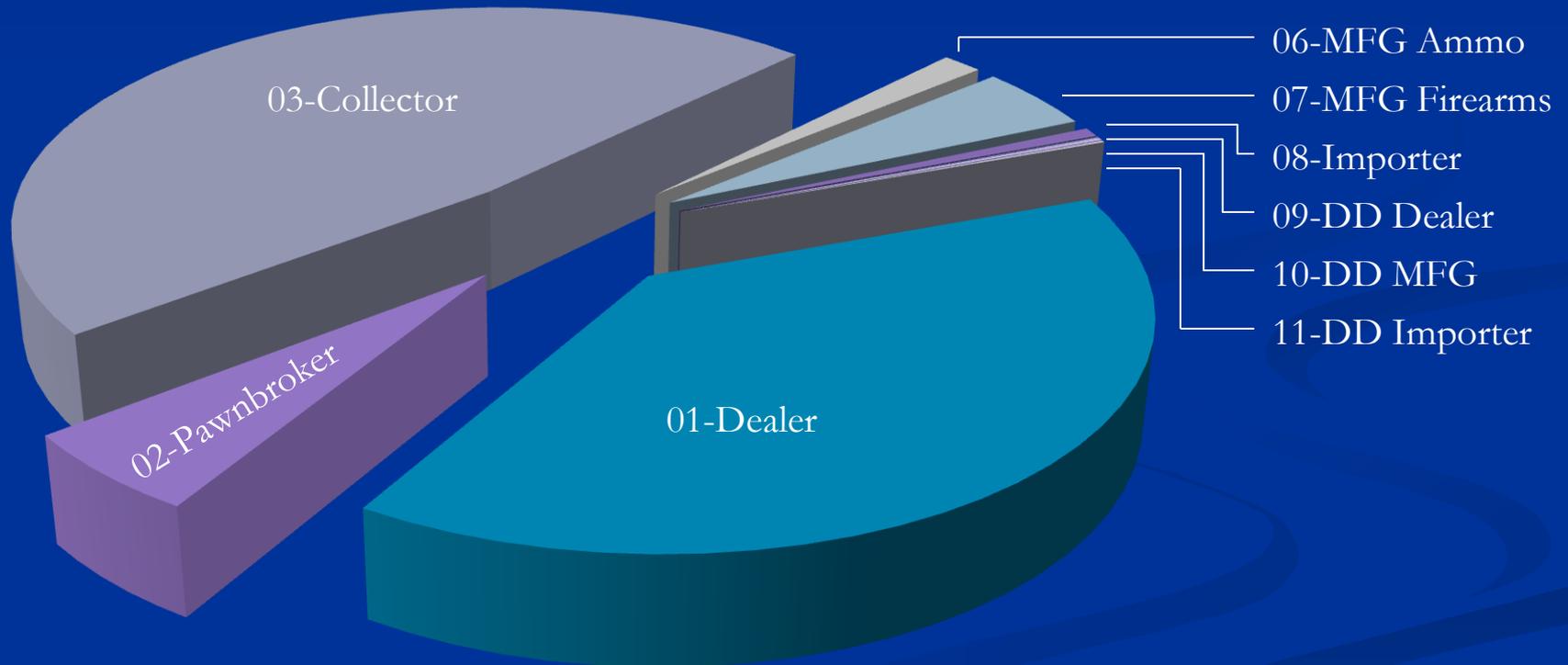
July 31 – August 1, 2012

Active Federal Firearms Licenses

Type	Number	Percent
01-Dealer	50,224	38.86
02-Pawnbroker	7,318	5.66
03-Collector	61,419	47.52
06-MFG of Ammo	2,020	1.56
07-MFG of Firearms	6,964	5.39
08-Importer	831	.64
09-DD Dealer	51	.04
10-DD MFG	255	.20
11-DD Importer	167	.13
Total	129,179	100.00%

July 2012

Federal Firearms Licenses Market Share



Application Inspections

Importers	2010	2011	2012 (mid year)
Inspections Performed (Approved)	145	154	82
Others (Denied/Abandon/Withdrawn)	50	86	46

Manufacturers	2010	2011	2012 (mid year)
Inspections Performed (Approved)	1,371	1,894	1,133
Others (Denied/Abandon/Withdrawn)	362	439	246

Compliance Inspections Conducted Importers

Result	Percent				
	2008	2009	2010	2011	2012 (mid)
No Violations	58.37	49.37	59.03	56.97	48.94
Report of Violations	9.73	7.17	9.69	7.79	5.32
Warning Letter	9.34	4.64	7.49	6.56	8.51
Warning Conference	5.84	9.28	4.85	6.15	7.45
Revoked/Deny Renewal	1.56	0.42	0.88	0.00	0.00
Surr. ILO Revocation	1.56	0.00	0.44	0.00	1.06
OOB/Not ILO Rev	13.62	16.88	16.30	14.34	26.60
Other	0.00	12.24	1.32	8.20	2.13
Total	100.00%	100.00%	100.00%	100.00%	100.00%

Compliance Inspections Conducted Manufacturers

Result	Percent				
	2008	2009	2010	2011	2012 (mid)
No Violations	61.13	51.68	54.95	53.49	56.94
Report of Violations	9.84	9.62	11.13	11.00	11.86
Warning Letter	7.38	7.72	9.59	8.40	8.27
Warning Conference	5.90	5.37	7.32	5.72	5.15
Revoked/Deny Renewal	0.98	0.34	0.62	0.52	0.31
Surr. ILO Revocation	0.12	0.22	0.41	0.30	0.16
OOB/Not ILO Rev	13.53	11.97	14.54	12.70	15.60
Other	1.11	13.09	1.44	7.88	1.72
Total	100.00%	100.00%	100.00%	100.00%	100.00%

Importers

MOST FREQUENTLY CITED FIREARMS VIOLATIONS - Importers		YEAR		
		June 2012	FY 2011	FY 2010
Citation	Violation Description	RANK	RANK	RANK
27 CFR 478.125(e)	Failure to timely record information in bound record (A&D record)	1	1	1
27 CFR 478.21 - (a) - (b)	Failure to complete forms as indicated in instructions (this violation is often cited when the licensee failed to properly complete a form, but there is not a separate regulatory citation addressing the omitted or misdocumented item)	2	2	3
27 CFR 478.124(c)(1)	Transferee did not properly complete Section A, F 4473	3	3	2
27 CFR 478.124(c)(3)(iv)	Licensee did not record on F 4473 the date on which NICS was contacted	4	4	4
27 CFR 478.124(c)(5)	Licensee did not sign and date F 4473	5	5	--
27 CFR 478.126a	Licensee failed to report multiple handgun sales	--	--	5

Manufacturers

MOST FREQUENTLY CITED FIREARMS VIOLATIONS - Manufacturers		YEAR		
		June 2012	FY 2011	FY 2010
Citation	Violation Description	RANK	RANK	RANK
27 CFR 478.124(c)(1)	Transferee did not properly complete Section A, F 4473	1	2	3
27 CFR 478.21 - (a) - (b)	Failure to complete forms as indicated in instructions (this violation is often cited when the licensee failed to properly complete a form, but there is not a separate regulatory citation addressing the omitted or misdocumented item)	2	1	2
27 CFR 478.125(e)	Failure to timely record information in bound record (A&D record)	3	3	1
27 CFR 478.124(c)(3)(iv)	Licensee did not record on F 4473 the date on which NICS was contacted	4	4	4
27 CFR 478.126a	Licensee failed to report multiple handgun sales	5	--	--
27 CFR 478.124(c)(5)	Licensee did not sign and date F 4473	--	5	5

Missing Firearms Importers

	2010	2011	2012 (mid)	Total
Initial Inventory Check	1,278	1,241	872	3,391
After Reconciliation	63	650	119	832

Manufacturers

	2010	2011	2012 (mid)	Total
Initial Inventory Check	15,303	99,814	3,622	118,739
After Reconciliation	3,765	1,880	241	5,886

Field IOIs

FY 2012	FY 2011	FY 2010	FY 2009	FY 2008	FY 2007
618	624	590	601	638	621

Additional Activities

- Outreach
- Firearms & Explosives theft/loss
- ATF Magazines
- Special requests
- Collateral Inspections
- Initiatives
- Federal, State & local support

Performance Measures

- Industry members inspected in the last five years (application/compliance)
- Missing firearms from inventory (initial and after reconciliation)
- Annual compliance inspections completed
- % of license applications acted upon within authorize time frames
- % of ATF license actions upheld by judicial rulings.

Revocation Process

- Notice of Revocation issued
- 15 days to request hearing
- No hearing - Final Notice of Revocation issued
- If hearing is requested
- Hearing officer makes recommendation to DIO
- Written notification of decision

Revocation Process

- Seek judicial review within 60 days of the receipt of the Final Notice of Revocation
- Appeal to the relevant U.S. Circuit Court
- Appeal to have the case reviewed by the entire panel of judges on that circuit
- Appeal to the Supreme Court.
- Denials of applications - no final notice is issued
- Submit renewal application

Curtis W. Gilbert
Office of Field Operations
Deputy Assistant Director
Industry Operations