

Prescribed Requisites for COMPUTERIZED A & D SOFTWARE

Before a Federal firearms licensee can use a specific computer program for recordkeeping in lieu of the required bound book format, it is necessary to get prior approval from ATF. The Bureau does not issue blanket approvals for commercially available software programs nor does it endorse any particular product. All requests for a computerized recordkeeping variance must be sent to the Director of Industry Operations in your area. These procedures are outlined in 27 C.F.R. § 478.125(h) in the Federal Firearms Regulations Reference Guide, ATF P 5300.4.

All requested systems must be accompanied by a sample printout of the format to be used and meet the following criteria:

1. Conform to all regulatory requirements for pertinent information. (See 27 C.F.R. §§ 478.122, 478.123, OR 478.125.)
2. Be able to be queried by serial number and acquisition date of firearm. It would suffice to use commonly recognized trade name or abbreviations when denoting manufacturer or importer.
3. Have an acceptable daily memory backup system, such as disk or tape.
4. Have the capacity to provide a periodic printout of all records:
 - (a) at least semiannually;
 - (b) upon request by an ATF officer when required by law;
 - (c) when the system memory is purged;
 - (d) when the license is terminated, and
 - (e) sequentially by date of acquisition for all firearms in inventory, as well as all firearms sold during the period covered;
5. Be able to record both the manufacturer and the importer for foreign-made firearms.
6. Yield a printout that may include flintlock, matchlock, percussion cap, or other antique firearms.
7. Include the name and address or name and license number of the suppliers and purchasers/transferees in the computer data. The name and an **ATF Form 4473** transaction number may be used in lieu of the name and address for recording the transfer of a firearm to a non-licensee, if the **Forms 4473** are filed numerically.
8. Be self-contained, without reliance upon invoices or other paper/manual systems to provide any of the above information.
9. Upon termination of a license the licensee, must provide an ASCII text file (conforming to common industry standards) and a file description, in addition to printout(s) of all records to the Out of Business Records Center. The printout and SCII text file must contain the inform, lion prescribed in 27 CFR § 478.125(e).

10. Allow users to forward all records to the Out of Business Records Center, per 27 C.F.R. § 478.127, if the business is discontinued.

- o NOTE: Within 30 days after discontinuance of business, Federal firearms licensees are required to send their records to:

244 Needy Road, Martinsburg, WV 25401

11. Any proposed changes in an approved system must be submitted to local ATF Director of Industry Operations* for evaluation and consideration prior to implementation. Thus, if a licensee wants to change or upgrade the computer software system, the licensee must submit a new variance request to address the proposed system change or upgrade.

Finally, any request approved by ATF will contain the following language:

"This approval may be withdrawn if administrative difficulties arise. A copy of this letter should be made a part of your permanent records and be available for inspection by any officer of the Bureau."