

ATF User Research

How do people research ATF regulatory materials? From regs to rulings and beyond.

Readout for the January 25, 2016 workshop at GSA

GOALS

eRegulations is a tool that is currently focused only on regulations.

**How do we best
customize it to fit ATF's
regulatory environment?**

APPROACH

Who did we talk to?

16

Total

8

Internal
ATF staff

8

External
users

Internal ATF discussions

- 1 - Chief of the Firearms Industry Branch
- 3 - Firearms Enforcement Specialists
- 1 - Chief of the Explosives Industry Branch
- 1 - Explosives Program Manager
- 2 - Area supervisors

External users

- 5 - Explosives industry
- 2 - Firearms industry
- 1 - Consultant who used to work for ATF

Insights

What did we learn?

Internal users

INTERNAL INSIGHTS

Regulations are hard.

INTERNAL INSIGHTS

“ How do we communicate what this regulation actually means in terms that are easily understood by the general audience?

We always struggle with readability and understandability both for the public, and our internal group. And, that's why we get the volume of questions that we do.

”

INTERNAL INSIGHTS

“ We have a hard enough time getting them to read the regulation as it is...They're probably more likely to read something a special interest group puts out than something that we put out. **”**

INTERNAL INSIGHTS

Things aren't connected.

Tools used by the program managers:

- Email server of past responses
- Share drive with topic-based folders and PDFs
- The reg reference guide (orange or white)
- Oftentimes, check the Q&As first because they have an index, and are more plain language.

INTERNAL INSIGHTS

“ Everyone [answering inquiries] has to be a researcher / networker. You have to know where to go to get the answer or who to ask.

”

General understanding

Difference between regulations, rulings, open letters, etc... very well understood.

External users

EXTERNAL INSIGHTS



the orange/white book

PRIOR TO MAY 24, 2003 ✓

Example 2. An ATF F 5400.8 is not required when:

a. An employee of the distributor takes possession of the explosives for the purpose of transport to the purchaser.

b. An employee of a common or contract carrier hired by the distributor takes possession of the explosives for the purpose of transport to the purchaser.

(2) License/permit verification of individuals.

(i) The distributee must furnish a certified copy (or, in the case of a user-limited, the original) of the license or permit. The certified copy need be furnished only once during the current term of the license or permit. Also, a licensee need not furnish certified copies of licenses to other licensed locations operated by such licensee.

(ii) The distributor may obtain any additional verification as the distributor deems necessary.

(3) License/permit verification of business organizations.

(i) A business organization may (in lieu of furnishing a certified copy of a license) furnish the distributor a certified list which contains the name, address, license number and date of license expiration of each licensed location. The certified list need be furnished only once during the current term of the license or permit. Also, a business organization need not furnish a certified list to other licensed locations operated by such business organization.

(ii) A business organization must, prior to ordering explosive materials, furnish the licensee or permittee a current

(iv) The licensee or permittee purchasing explosive materials must revise the furnished copy of the certified statement only when the information is no longer current.

(5) User-limited permit transactions. A user-limited permit issued under the provisions of this part is valid for only a single purchase transaction and is not renewable (see § 555.51).

Accordingly, at the time a user-limited permittee orders explosive materials, the licensed distributor must write on the front of the user-limited permit the transaction date, his signature, and the distributor's license number prior to returning the permit to the user-limited permittee.

(b) Transactions among licensees/permittees on and after May 24, 2003—

(1) General.

(i) A licensed importer, licensed manufacturer or licensed dealer selling or otherwise distributing explosive materials (or a holder of a user permit disposing of surplus stock to a licensee; a holder of a user permit; or a holder of a limited permit who is within the same State as the distributor) who has the certified information required by this section may sell or distribute explosive materials to a licensee or permittee for not more than 45 days following the expiration date of the distributee's license or permit, unless the distributor knows or has reason to believe that the distributee's authority to continue business or operations under this part has been terminated.

(ii) A licensed importer, licensed manufacturer or licensed dealer selling or otherwise distributing explosive materials (or a holder of a user permit disposing of surplus stock

current, not expired

certified copy of license

copy of license

EXTERNAL INSIGHTS

Newsletters are useful.

EXTERNAL INSIGHTS

“ Online searchable options are crucial. **”**

FILE HOME INSERT PAGE LAYOUT FORMULAS DATA REVIEW VIEW ACF

Cut Copy Paste Format Painter Clipboard Font Alignment

Arial 14 A A Wrap Text B I U Merge & Center

A1 Firearms Newsletter Index

	A	B	C	D
1	Firearms Newsletter Index			
2	Topic	Newsletter	Page	
3	A&D - General	March 2006	5	
4	A&D - Prior Firearms	March 2006	6	
5	A&D - Sale of Personal Firearms	March 2006	6	
6	A&D - Type	December 2002	7	
7	A&D - Variance	February 2005	9	
8	Adverse Actions	November 2008	5	
9	Air Guns - Russian	December 2002	9	
10	Alien - Prohibited Person	February 1999	4	
11	Aliens - 90 days residency	August 2004	5	
12	Aliens - Ammunition	November 2008	1	
13	Aliens - Ammunition	April 2001	7	
14	Aliens - Canada	1992 Vol. 2	3	
15	Aliens - Firearms	November 2008	1	
16	Aliens - General	December 2002	1	
17	Aliens - NICS	August 2005	3	
18	Aliens - Nonimmigrant	April 2001	1	
19	Aliens - Rentals	December 2002	6	
20	Aliens - Residency	April 2001	7	
21	Aliens - Transfers	December 2002	8	
22	Alines - Non Immigrant Aliens	August 2005	3	
23	Alines - Nonimmigrant Aliens	June 2010	8	
24	Antiques - Muzzle Loaders	February 2005	2	
25	Antiques - Muzzle Loaders	February 1999	3	
26	Armor Piercing Ammunition	1992 Vol. 2	5	
27	Assault Weapons Ban - General	February 2005	5	
28	ATF F 4473 - Q&A	November 2009	4	
29	ATF Form 4473 - Copies	December 2002	2	
30	ATF Form 4473 - Corporations purchases	December 2002	5	
31	ATF Form 4473 - Instructions	April 2001	6	
32	ATF Form 4473 - July 2005	February 2005	1	
33	ATF Form 4473 - Q&A - July 2005	March 2006	1	
34	ATF Form 4473 - Race	December 2002	5	
35	ATF Form 4473 - Yes answers	April 2001	14	
36	ATF Form 6	June 2010	6	
37	Auctioning Firearms	April 2001	3	
38	Black Powder - Dealers	August 2005	3	
39	Brady	August 1996 Vol.1	1	
40	C&R - General	February 2005	1	
41	C&R - General	August 2004	7	
42	C&R - Multiple sales	December 2002	5	
43	C&R - NICS	September 1999	4	
44	C&R - out of state sales	April 2001	7	

Exp Fire

Folder New Open Select

y Rulings > Firearms Rulings

Name	Date modified	Type	Size
ATF Ruling 2003-6	6/21/2010 7:19 AM	Adobe Acrobat D...	15 KB
ATF Ruling 2004-1	6/21/2010 7:19 AM	Adobe Acrobat D...	18 KB
ATF Ruling 2004-2	6/21/2010 7:18 AM	Adobe Acrobat D...	38 KB
ATF Ruling 2004-5	6/21/2010 7:17 AM	Adobe Acrobat D...	18 KB
ATF Ruling 2005-4 (Paintball Silencers)	6/21/2010 7:16 AM	Adobe Acrobat D...	14 KB
ATF Ruling 2006-2 (Auto-Fire Trigger Devices)	6/21/2010 7:16 AM	Adobe Acrobat D...	68 KB
ATF Ruling 2007-4 (Electronic Recordkeeping - Data Storage Devices)	6/21/2010 7:15 AM	Adobe Acrobat D...	15 KB
ATF Ruling 2008-1 (Nomenclature - FH FNC Upper Assembly Classified as a Receiver)	6/21/2010 7:15 AM	Adobe Acrobat D...	12 KB
ATF Ruling 2008-2 (Records - Computerized Recordkeeping)	6/21/2010 7:14 AM	Adobe Acrobat D...	23 KB
ATF Ruling 2008-3 (Records - Electronic 4473)	6/21/2010 7:14 AM	Adobe Acrobat D...	18 KB
ATF Ruling 2009-1 (Licensure - Camouflaging or Engraving)	6/21/2010 7:14 AM	Adobe Acrobat D...	339 KB
ATF Ruling 2009-2 (Licensure - Drop-In Replacement Part or Repairs)	6/21/2010 7:13 AM	Adobe Acrobat D...	12 KB
ATF Ruling 2009-5 (Marking - Manufacturers performing processes on behalf of another)	6/21/2010 7:13 AM	Adobe Acrobat D...	16 KB
ATF Ruling 2010-1 (Records - Firearm Temporary Transfer to Non-Licensed Agent)	6/21/2010 7:12 AM	Adobe Acrobat D...	20 KB
ATF Ruling 2010-3 (Vickers-Maxim MG NFA Marking)	10/4/2010 11:27 AM	Adobe Acrobat D...	308 KB
ATF Ruling 2010-4 (AR-M16 Variant Airguns Considered Firearms)	11/8/2010 1:48 PM	Adobe Acrobat D...	109 KB
ATF Ruling 2010-6 (Residency Defined)	1/9/2013 11:43 AM	Adobe Acrobat D...	98 KB
ATF Ruling 2010-8 (Consolidated Records - Manufacturers)	1/9/2013 11:46 AM	Adobe Acrobat D...	23 KB
ATF Ruling 2010-9 (Import Permit Supportive Documentation)	1/9/2013 11:47 AM	Adobe Acrobat D...	35 KB
ATF Ruling 2010-10 (Gunsmiths Performing Work for Manufacturers)	1/9/2013 11:47 AM	Adobe Acrobat D...	26 KB
ATF Ruling 2011-1 (Consolidated Records - Importers)	1/9/2013 11:49 AM	Adobe Acrobat D...	76 KB
ATF Ruling 2011-4 (Pistols Configured from Rifles, Vise-Versa)	1/9/2013 11:51 AM	Adobe Acrobat D...	83 KB
ATF Ruling 2012-1 (Time Period to Identify Firearms Manufactured)	1/9/2013 11:51 AM	Adobe Acrobat D...	128 KB
Ruling 2012-3 (Electronic AMFER Submissions)	7/15/2013 9:01 AM	Adobe Acrobat D...	107 KB
Ruling 2013-1 (Electronic Form 6 and 6A)	7/15/2013 8:59 AM	Adobe Acrobat D...	91 KB
Ruling 2013-2 - (NFA Electronic Forms)	8/2/2013 1:40 PM	Adobe Acrobat D...	827 KB
Ruling 2013-3 - (Adaptation of Existing Serial Numbers by Manufacturers & Importers)	9/12/2013 3:24 PM	Adobe Acrobat D...	1,494 KB
Ruling 2013-5 (Electronic A-D Firearms Books)	1/7/2014 2:58 PM	Adobe Acrobat D...	1,155 KB
Ruling 2014-1 (Manufacturing - Inventory of Machineguns for LE and Military)	9/10/2014 9:10 AM	Adobe Acrobat D...	168 KB
Ruling 2015-1 (Manufacturing Gunsmithing Clarification - Unfinished Receivers Ruling)	1/6/2015 8:58 AM	Adobe Acrobat D...	359 KB

EXTERNAL INSIGHTS

**Having a legal
background is not
the norm.**

EXTERNAL INSIGHTS

Alphabet soup

ATF, DOT, OSHA, ETC...

EXTERNAL INSIGHTS

Professional organizations

NSSF, IME, ISE, ETC...

EXTERNAL INSIGHTS

Have I found everything?

EXTERNAL INSIGHTS

“ Sometimes I feel like I’m wasting time looking for a needle in a haystack, and sometimes I feel like I’m risking not looking.

”

EXTERNAL INSIGHTS

“ There are times when you just say,
‘Look, I think I know what this means. I
don’t have time, can’t find it, or don’t
know where to look.’

”

General understanding

Difference between regulations, rulings, open letters, etc... not 100% understood.

EXTERNAL INSIGHTS

User base

USER BASE

Occupational and Occasional Users

Occupational

I sell, manufacture, use, etc... any of these regulated materials daily as my main source of business and income.

Occasional

I sell, manufacture, use, etc... any of these regulated materials a couple times a year.

The firearms and explosives industries both include occupational and occasional users.

USER BASE

Occasional firearms users

- I make a couple of guns a year because it is fun.
- I'm an antique store owner. I sell a few antique guns a year to black powder enthusiasts.

USER BASE

Occupational firearms users

- I'm a gun dealer. I own a small shop with a few employees.
- I manufacture guns and parts. I'm the second biggest manufacturer of firearms in the US. I have a lot of partners that I sell to on a regular basis.
- I'm a big corporate shop who manufactures and sells firearms. I have a big legal department to navigate all the laws and regulations I need to comply with. Even people who are not interested in guns probably recognize my name.

USER BASE

Occasional explosives users

- Once a year, I plan and run my town's 4th of July fireworks show.
- I'm a farmer and need to get rid of a stump on my land, or make room for something a couple of times a year.

USER BASE

Occupational explosives users

- I own a fireworks shop, and sell them all year round.
- I own a quarry and need to use high explosives in my day to day business needs.
- I'm a big corporation who manufactures and sells explosives. I belong to organizations like the IME, and have teams of people to make sure I'm in compliance with all the organizations I need to be in compliance with.

General understanding

Occasional users may have less of a regulatory understanding than occupational users.

Asks

If you had a magic wand, what would you want?

ASKS

“ If I'm looking at theft of firearms, it will take me to the reg, and then linked from there is forms, rulings, contact information, etc...

”

ASKS

“

Probably just a real good search engine. I could type in some details, and get something back.

We could push it down to the site level, instead of [the factory] calling me with every challenge that they face, they could exhaust that first. Then talk to me.

”

ASKS

- **Really good search**
- **One-stop research shop**
- **Cross-referencing to rulings and other docs from the regulation**
- Better eForm system (only 1 ask)
- Classes to educate on the regulation's requirements (only 1 ask)
- FTB determinations published in 1 searchable place (only 1 ask)

Ready to sketch?!