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



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.



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.



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

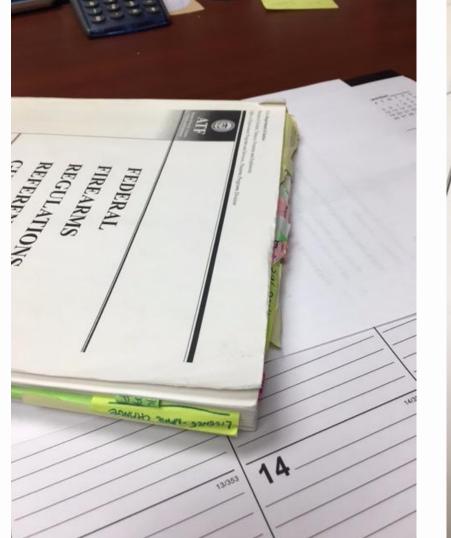
General understanding

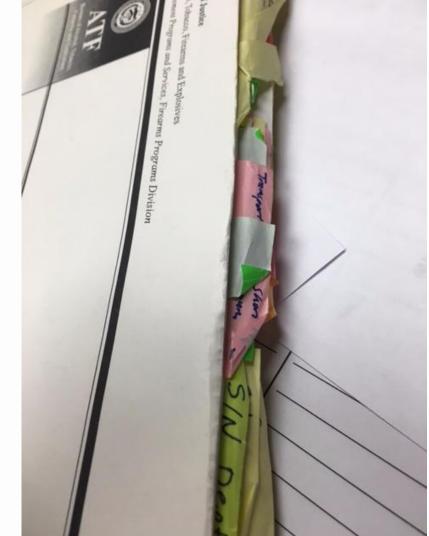
Difference between regulations, rulings, open letters, etc... very well understood.

External users









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 rtified list to other licensed locations operated by such business
- organization.

 (ii) A business organization must, prior to ordering

avalogive meterials 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

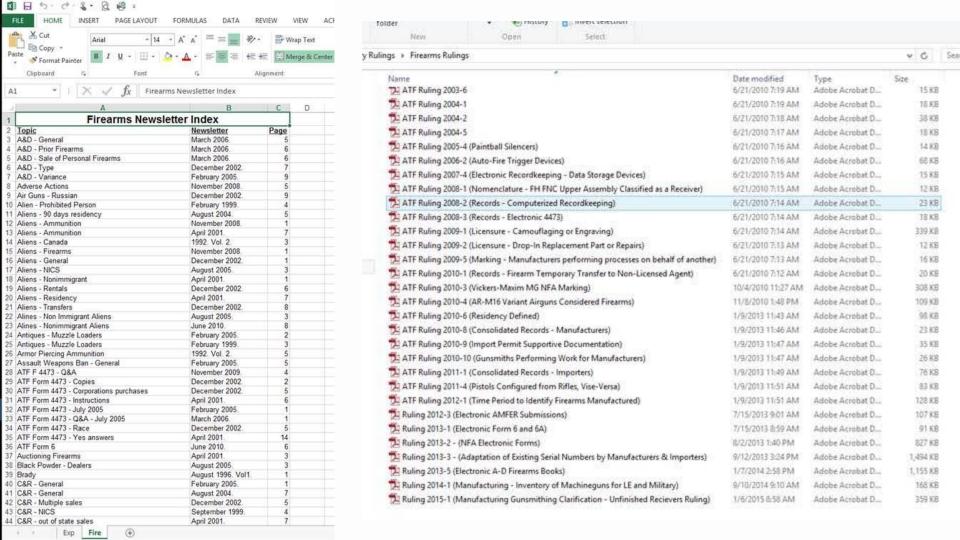
Newsletters are useful.

EXTERNAL INSIGHTS



Online searchable options are crucial. ***





Having a legal background is not the norm.

Alphabet soup

ATF, DOT, OSHA, ETC...

Professional organizations

NSSF, IME, ISE, ETC...

Have I found everything?



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.



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.

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.

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.

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?



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...





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?!

