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Citizens Association for Responsible Gun Ownership = CARGO

www.cargogunclub.org

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Hello Fellow CARGO Members,

The BATFE has published a guidance document and there is a very short request for comment period related to pistol braces. PLEASE download the club newsletter for critical information about how to respond to the RFC.

With the uncertainty of the past election, please watch your email for any urgent updates and calls to action. The Georgia Senate election is critical to our Republic's future, please pay special attention to these races.

As a reminder, the November / December CARGO meeting has been canceled.

Out of the abundance of caution, we are not going to meet during the November / December timeframe. We will re-evaluate our options for January.

I hope that you are all well and surviving the situation as best you can. Please use the CARGO@att.net email or the CARGO Facebook page if you need to get in touch with the club.

Take care and be safe,

Paul

When was the last time you visited our web site? Please take some time to go to the CARGO website at www.cargogunclub.org

Thank you,
Paul Curtis
President – CARGO

www.cargogunclub.org

"If you can read this, thank a teacher. For the fact that it is in English, thank a Veteran."

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In anticipation of the incoming Biden administration, the BATFE have gone all in on their continued assault on our rights. The BATFE has published a paper related to pistols with “Stabilizing Braces” and their clear intent to completely replace 8 years of guidance with an arcane formula for what constitutes a pistol vs. a short-barreled rifle. Their full letter and request for comment is here:

[Federal Register :: Objective Factors for Classifying Weapons with “Stabilizing Braces”](#)

Unfortunately, there is nothing but subjectivity in their published “objective” guidance. It depends on what they feel randomly and without solid rules.

The BATFE is giving the public 14 days to respond so if you want to put in your response you must act fast.

HOWEVER, there is extensive sentiment that this is nothing but a smoke screen to compile yet another list of firearms owners since all comments are public and they will keep records of all who reply (highlights are mine):

Public Participation

A. Comments Sought

ATF is accepting comments from all interested persons on the use of the objective factors listed in this document. All comments must reference this document's docket number, ATF 2020R-10, be legible, and **include the commenter's complete first and last name and full mailing address**. ATF will not consider, or respond to, comments that do not meet these requirements or comments containing excessive profanity. Comments that do not meet these criteria will not be considered. ATF will retain anonymous comments and those containing excessive profanity as part of this administrative record, but will not publish such documents on www.regulations.gov. ATF will treat all comments as originals and will not acknowledge receipt of comments. In addition, if ATF cannot read your comment due to technical difficulties and cannot contact you for clarification, ATF may not be able to consider your comment.

ATF will carefully consider all comments, as appropriate, received on or before the closing date, and will give comments after that date the same consideration if practical to do so, but assurance of consideration cannot be given except as to comments received on or before the closing date.

B. Confidentiality

ATF will make all comments meeting the requirements of this section, whether submitted electronically or on paper, available for public viewing at ATF and on the internet through the Federal eRulemaking Portal, and subject to the Freedom of Information Act (5 U.S.C. 552).

Commenters who do not want their name or other personal identifying information posted on the internet should submit comments by mail or facsimile, along with a separate cover sheet containing their personal identifying information. Both the cover sheet and comment must reference this docket number (2020R-10). For comments submitted by mail or facsimile, information contained on the cover sheet will not appear when posted on the internet but any personal identifying information that appears within a comment will not be redacted by ATF and it will appear on the internet.

A commenter may submit to ATF information identified as proprietary or confidential business information. The commenter shall place any portion of a comment that is proprietary or confidential business information under law on pages separate from the balance of the comment with each page prominently marked "PROPRIETARY OR CONFIDENTIAL BUSINESS INFORMATION" at the top of the page.

ATF will not make proprietary or confidential business information submitted in compliance with these instructions available when disclosing the comments that it received, but will disclose that the commenter provided proprietary or confidential business information that ATF is holding in a separate file to which the public does not have access. If ATF receives a request to examine or copy this information, it will treat it as any other request under the Freedom of Information Act (5 U.S.C. 552). In addition, ATF will disclose such proprietary or confidential business information to the extent required by other legal process.

C. Submitting Comments

Submit comments in any of three ways (but do not submit the same comment multiple times or by more than one method). Hand-delivered comments will not be accepted.

- *Federal eRulemaking Portal*: ATF recommends that you submit your comments to ATF via the Federal eRulemaking portal at www.regulations.gov and follow the instructions. Comments will be posted within a few days of being submitted. However, if large volumes of comments are being processed simultaneously, your comment may not be viewable for up to several weeks. Please keep the comment tracking number that is provided after you have successfully uploaded your comment.
- *Mail*: Send written comments to the address listed in **ADDRESSES** section of this document. Written comments must appear in minimum 12-point font size (.17 inches), include the commenter's first and last name and full mailing address, be signed, and may be of any length.
- *Facsimile*: Submit comments by facsimile transmission to (202) 648-9741. Faxed comments must:

1. Be legible and appear in minimum 12-point font size (.17 inches);
2. Be 8 1/2" x 11" paper;
3. Be signed and contain the commenter's complete first and last name and full mailing address;
and
4. Be no more than five pages long.

Part of their letter includes a section where they will create a “expedited process” to register these pistols as SBRs without the \$200 tax stamp and the 4 to 11 month wait.

It shocks me that the BATFE has the ability to create an expedited process to validate and approve millions of pistols as SBRs in order to capture as many firearms as possible in their gun registry but the exact same pistol, submitted with a \$200 tax stamp to make it an SBR normally takes 4 to 11 months to approve?

This truly is not about keeping anyone safe or stopping criminals it is all about registration of firearms.

If you are a student of history, you already know that registration leads to confiscation.

This just underscores almost everything that is wrong with the BATFE and the Government as a whole. They forgot that they work for us and that we are not subjects to the Government.

IF you do not feel comfortable going through the hoops that the BATFE have set up for this circus, please contact your US Congressional Representatives and Senators directly to ask them to reign in this out-of-control agency.

These links can help you get the necessary information:

[Contacting Congress](#)

[Contact Your Senators \(contactsenators.com\)](#)

[Find Your Representative | house.gov](#)

Sample Reply / Comments from the GOA website:

[Comment on the ATF's Proposed Rule Changes to Pistol Braces | Gun Owners of America](#)

ATTN: Docket Number ATF 2020R-10

To: Office of Regulatory Affairs

I am submitting comments in opposition to proposed regulations posted on December 18 and entitled "Objective Factors for Classifying Weapons with 'Stabilizing Braces.'"

Millions of law-abiding American citizens took ATF at its word when the agency approved the installation of so-called "stabilizing braces" onto firearms receivers and promised that said firearms were handguns and not rifles.

Now, over eight years after your initial determination, you are soliciting comments on what the ATF is calling "objective design features" with an apparent goal of determining that many firearms with rifled bores that are shorter than 16 inches are short barreled rifles (SBRs).

The new, design based "features" are not objective, they are clearly subjective and look like they are designed and intended to bring your agency's rule-making to a predetermined outcome.

These "features" do not appear anywhere in the US Code:

- Type and Caliber
- Weight and Length
- Length of Pull
- Attachment Method
- Stabilizing Brace Design Features

Not only do these terms NOT appear in the US Code, they are subject to varying interpretations. For example, a firearm that is considered heavy and long by a small statured person could just as easily be considered light and short by a larger framed person. Likewise for length of pull. In a free society, it is virtually impossible to regulate design features because smart people will continue to innovate and introduce newer, more effective products to the free market.

Furthermore, the inclusion of accessories in your evaluation process is equally absurd. ATF has the authority (within limits set by Congress) to regulate firearms and ammunition in interstate commerce. There is absolutely no statutory authority to regulate accessories such as:

- Secondary Grip
- Sights and Scopes
- Peripheral Accessories

It would be impossible to regulate what is literally thousands of different grips, sights, scopes and other peripheral accessories.

It is clearly obvious that ATF is attempting to write the law instead of enforcing the laws that Congress has enacted. This violates the Separation of Powers, not to mention the Second Amendment of the U.S. Constitution.

I urge you to reject this idea at once and immediately fall back to the position that ATF has taken since at least 2012, that the installation of a “stabilizing brace” on a firearm, does not change the firearm from a handgun into a rifle, irrespective of what other accessories might be used such as scopes or grips.

Thank you for kind consideration.

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Paul Curtis
President - CARGO
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