



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and ExplosivesMartinsburg, West Virginia 25405 903050:WJS
www.atf.gov 3311/2012-1201Mr. Alan Aronstein
Hi-Standard Manufacturing Company
5151 Mitchelldale, Ste. B11
Houston, Texas 77902

SEP 28 2012

Dear Mr. Aronstein:

This is in reference to your recent correspondence to the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), Firearms Technology Branch (FTB), with accompanying samples (see enclosed photos) for evaluation and classification per provisions of the Gun Control Act of 1968 (GCA), 18 U.S.C. § 921(a)(3).

As background to our discussion, the GCA, § 921(a)(3), defines the term “**firearm**” to include:

... (A) any weapon (including a starter gun) which will or is designed to or may readily be converted to expel a projectile by the action of an explosive; [and] (B) the frame or receiver of any such weapon....

Please note that any receiver-casting or receiver-blank that has been finished to the point at which it can be recognized as a firearm frame or receiver is a “firearm.” Our Branch has held that in order not to be recognized as a “firearm,” a semiautomatic-style receiver-blank or receiver-casting must not have: a) slide rails or slide rail indexing marks; b) a barrel seat; and c) more than two of any of the following four critical holes drilled—1) slide-stop pivot, 2) sear pivot, 3) disconnecter, or 4) hammer pivot pin.

The FTB examination of your submitted 1911-type sample found that it has had the following machining operations partially or fully completed:

- Casting from steel, the outside profile of which is generally to shape, with recess for the hammer slot and the magazine well.
- The ramp partially formed, partially machined.
- Relief cut in front strap for the magazine floor-plate.
- Thumb-safety detent area partially machined.
- Magazine-catch opening machined.
- Trigger-assembly opening machined.

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We noted that there is no barrel seat; there are no mounting pin holes for the hammer, trigger, sear or takedown pin; and no slide guide rails have been formed or indexed.

Further, the FTB examination of your target-pistol type sample disclosed that it has had the following machining operations partially or fully completed:

- Casting from steel, the outside profile of which is generally to shape, with recess for the hammer slot machined.
- Magazine well partially machined.
- Feed ramp formed and machined.
- Relief cut in front strap for the magazine floor-plate.
- Magazine-catch area on front strap machined.
- Opening for magazine-catch roller and roller pin machined.
- Trigger recess machined.
- Trigger stop-pin hole machined.
- Barrel seat partially machined.
- Barrel take-down pin hole machined.

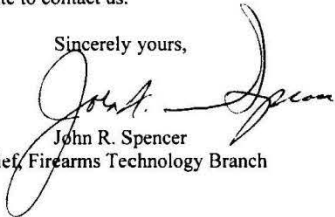
We noted that there is a partially machined barrel seat; however, there are no mounting pin holes for the hammer, trigger, and sear, and no slide guide rails have been formed or indexed.

In conclusion, the FTB evaluation finds that the submitted Hi-Standard, 1911-type receiver blank and Hi-Standard, target-pistol type receiver blank are not "firearms" as defined.

In order to facilitate the return of your samples, please provide us with your FedEx account or a U.S. Postal Service, UPS, or other appropriate carrier return-shipping label within 30 days of the receipt of this letter.

We thank you for your inquiry and trust the foregoing has been responsive. Should you have any additional questions, do not hesitate to contact us.

Sincerely yours,


John R. Spencer
Chief, Firearms Technology Branch

Enclosure