



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

Martinsburg, WV
25405
www.atf.gov

SEP 15 2017

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3311/307459

Mr. TJ Osman
1911 Builders
825 Kuhn Drive
Suite 107
Chula Vista, CA 91914

Dear Mr. Osman:

This is in response to your correspondence to the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), Firearms Technology Industry Services Branch (FTISB), which accompanied your sample of one 1911-style frame. This sample was submitted for evaluation and classification with respect to the Gun Control Act of 1968 (GCA), 18 U.S.C. § 921(a)(3).

As background, the GCA, § 921(a)(3), defines the term "**firearm**" to include:

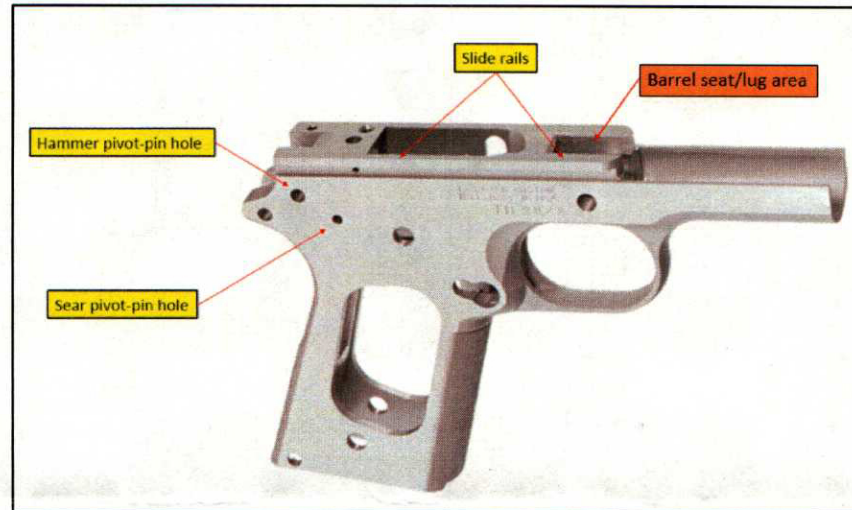
... (A) any weapon (including a starter gun) which will or is designed to or may readily be converted to expel a projectile by the action of an explosive; (B) the frame or receiver of any such weapon....

Please note that any frame-casting or frame-blank that has been manufactured or otherwise finished to the point at which it can be recognized as the frame or receiver of a firearm, is itself a "**firearm**" as defined.

FTISB had generally provided guidance that a 1911-style frame-blank or frame-casting reaches a stage of manufacture and would be classified as a firearm if any one of the following features is indexed or completed:

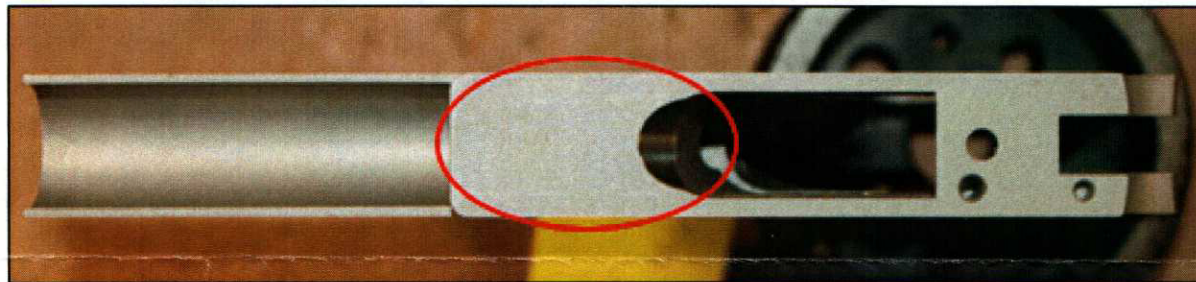
- a) slide rails;
- b) sear pin hole; or
- c) hammer pin hole.

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The above picture identifies these three critical areas. All other operations may be completed without affecting the classification, including complete milling or indexing of the barrel seat/lug area.

While this standard exists, at the request of the industry and, in an effort to alleviate undue constraints imposed on 1911-type frame manufactures, FTISB has previously approved an alternative to the test described above. This alternative configuration incorporates a solid unmilled, unmachined and unindexed barrel seat/barrel lug area. Because completing the barrel seat/lug area requires significant effort, FTISB permitted the industry member to instead complete, mill, machine or index one of the two critical pin holes (hammer pin or sear pin) without classifying it as a firearm receiver.



Solid unmilled, unmachined, and unindexed barrel seat and barrel lug area example.

Therefore, for a 1911 casting or blank to avoid classification as a frame or receiver it must meet the description in one of the two boxes below:

<p>Barrel seat/lug area may be milled, machined or indexed, but none of the following may be milled, machined or indexed:</p> <ul style="list-style-type: none">a) slide rails;b) sear pin hole; norc) hammer pin hole.	<p>Barrel seat/lug area is solid, and</p> <ul style="list-style-type: none">a) No slide rails milled, machined or indexed; <p style="text-align: center;">BUT</p> <ul style="list-style-type: none">b) 1 of 2 may be milled, machined or indexed<ul style="list-style-type: none">-sear pin hole, or-hammer pin hole
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FTISB retains these previously approved configurations as an option for manufacturers and importers of 1911-type firearm-castings or frame-blanks. To eliminate any confusion that may exist in this area, FTISB has distilled these to a single test comprised of three elements. FTISB advises that a 1911-type frame-casting or frame-blank has reached the stage of manufacture to be classified a “**firearm**” when it is in any one of the following configurations:

1. The slide rails are completed or indexed.
2. The barrel seat and barrel lug area is solid, unmilled, unmachined, and unindexed; and
The hammer pivot pin hole is completed or indexed
and
The sear pivot pin hole is completed or indexed.

[one pin hole or the other may be completed or indexed]

3. If the barrel seat and barrel lug area is milled, machined or indexed; and
The hammer pivot pin hole is completed or indexed,
or
The sear pivot pin hole is completed or indexed.

[neither pin hole may be completed or indexed]

If a 1911 firearm-casting or firearm-blank is in any of these configurations, then it will have reached the requisite stage of manufacture such that it will be classified as a “firearm frame” and therefore a “**firearm**” under the GCA.

The FTISB evaluation of your submitted sample found that the barrel-seat and barrel-lug area is machined, but the submitted sample does not have any of the critical machining operations completed. Specifically, we note that the slide rails are not completed or indexed, the sear pin hole is not completed or indexed, and the hammer pin hole is not completed or indexed.

Submitted sample:



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As stated above, the submitted sample has a completed barrel lug area, the slide rails are incomplete and have not been indexed, and neither of the two critical pin holes are completed. Accordingly, FTISB finds that the sample, as received, is not a “**firearm**” as defined in the GCA.

We caution that these findings are based on the sample as submitted. If the design, dimensions, configuration, method of operation, or materials used were changed, our determination would be subject to review.

The submitted sample will be returned to you under separate cover.

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,

A handwritten signature in black ink, appearing to read "Michael R. Curtis".

Michael R. Curtis

Chief, Firearms Technology Industry Services Branch