

Accuforge
485 Greenwood Street
Odenton, MD 21113

2/25/2021

Comments on HB175, HB638, and HB1291

HB175

- Current in-state ammunition vendors are not able to perform NICS checks as many of them are not required to have an FFL and ammunition sales alone does not meet the requirements for obtaining an FFL.

Ref: <https://www.atf.gov/firearms/qa/license-required-engage-business-selling-small-arms-ammunition>

- Current FFL holders are not able to perform NICS checks for the purpose of ammunition sales
- Many types of ammunition are not available from in-state ammunition vendors and a restriction on online sales would make it impossible for law-abiding citizens to get ammunition for their legally-owned firearms.

HB638

- This bill will do nothing to keep prohibited persons from obtaining or making guns. It is already illegal for prohibited persons to own these guns. This bill will only serve to burden law-abiding citizens.
- There is a long tradition in the USA of individuals making guns for their own use and there have never been any serial numbering or government approval required. There are many homemade and pre-1968 unserialized firearms owned by law-abiding citizens. This bill will make criminals out of many law-abiding citizens who will unwittingly violate it or those who will be unable to engrave their homemade firearms.
- There aren't currently enough FFL holders available to engrave / serialize existing firearms. Most FFL holders have a waitlist of 3-12 months for normal gunsmithing work. Since this work can't be done by a non-FFL holder and isn't within the capabilities of most home gun builders, it will be impossible to comply with this law.
- The criminalization of currently legal "any other weapon" (AOW) firearms serves no purpose other than to unreasonably burden law-abiding citizens. These firearms aren't used by criminals in any significant numbers. This is a solution to a problem that doesn't exist.
- There is already a federal ban on "undetectable" firearms. There is no reason for a similar state law.

HB1291

- This bill will unreasonably burden law-abiding citizens and potentially make criminals out of many unwitting individuals. Continued possession of an old flintlock with family history could make the owner a criminal through no action of their own.