



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

Marionburg, WV 25405

www.atf.gov

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Dear Mr. Hawbaker,

This is in reference to your latest correspondence to FTB, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), which is accompanied by an AR-type firearm in which AR-15 pattern fire-control components are installed (see enclosed photos). Your item was submitted in response to FTB letter # 2012-683-WS, which provided our evaluation of the last sample of your proposed trigger device. Although we informed you in letter #2012-683 that FTB had classified this device as a "machinegun" per 26 U.S.C. § 5845(b), we indicated that our Branch would evaluate it again if you could redesign your trigger device to incorporate a positive disconnecter mechanism.

The current sample examined by FTB consists of a modified trigger device (assembly) for AR-15 pattern firearms. This assembly is designed to allow one shot to be fired when the trigger is pulled, and another shot when the trigger is released. Further, we found that the device selector has not been machined to enable the trigger to be pulled further than an unmodified selector would allow. The trigger has been modified to incorporate a shaft which adjusts the position of the disconnecter relative to the trigger. Additionally, FTB observed that material on the top and bottom portion of the hammer has been removed, and our evaluation also disclosed that there is an additional "disconnecter" located directly behind the primary disconnecter. This "secondary" disconnecter enables the hammer to be held positively to rear, prior to the release of trigger, for the "release shot."

To determine its two modes of operation, FTB first performed a manual function test on the submitted sample in its "normal mode" with the device selector placed in its "12 o'clock position." This test disclosed that the submitted sample would function as an un-modified semiautomatic AR-type firearm.

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The second function test, performed in the "modified mode," with the device selector placed in its "9 o'clock position," found that (1) a pull of the trigger would release the hammer, and (2) a subsequent release of the trigger would allow the secondary disconnecter to release the hammer. At this point, an unmodified trigger group would retain the hammer on the trigger-engagement surface; the modified group, however, allows the hammer to travel forward, firing a cartridge by releasing the trigger.

Based on these function tests, our Branch has determined your system is designed and intended to allow only a single shot to be fired with each movement of the trigger since it incorporates a positive disconnecter function for the "pull" shot and the "release" shot. As a result, the safe capture of the hammer after the "pull" shot has been fired is not affected by the rapid release of the trigger by the shooter. Consequently, if the trigger is pulled slowly, a condition known as "hammer-follow" does not occur.

Live-fire testing of the accompanying host firearm with your submitted trigger device installed confirmed the results of the manual function testing. If the trigger was pulled and released deliberately and quickly, a single shot was fired for each pull and each release. Further, if the trigger was pulled slowly, "hammer-follow," which could cause a firearm to shoot automatically more than one shot, without manual reloading, by a single function of the trigger, was not observed—in contrast to our findings when testing your previously submitted sample.

Therefore, based on the results of our examination and testing, FTB has determined that your submitted trigger device, as received and examined, does not constitute a combination of parts designed and intended for use in converting a weapon into a machinegun. Also, FTB finds that the host AR-type firearm, CMMG MK-4 (serial number SCM-101303), not having any modifications made to the receiver that would cause it to fire automatically, is not a "machinegun" as defined in 26 U.S.C. 5845(b). This firearm, along with the installed trigger device, will be returned to you as soon as our Branch has received either a FedEx (or alternate carrier) account number, or a prepaid return label.

We thank you for providing FTB with a new sample and trust the foregoing has been responsive to your current evaluation request.

Sincerely yours,


Earl Griffith
Chief, Firearms Technology Branch

Enclosure



812-445-4028

