



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

Martinsburg, West Virginia 25405
www.atf.gov

903050:MRC
3311/2011-281

Mr. [REDACTED]

SEP 05 2011

Dear [REDACTED]:

This is in response to your faxed communication with enclosed photo to the Firearms Technology Branch (FTB), Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), in which you ask if attaching a saddle to the buffer tube of an AR-15 pistol would constitute the creation of a "short-barreled rifle (SBR)."

As you are aware, the amended Gun Control Act of 1968 (GCA), 18 U.S.C. Section 921(a)(7) defines the term "rifle" as:

...a weapon designed or redesigned, made or remade, and intended to be fired from the shoulder and designed or redesigned and made or remade to use the energy of an explosive to fire only a single projectile through a rifled bore for each single pull of the trigger.

Further, the GCA, 18 U.S.C. Section 921(a)(8), defines "short-barreled rifle" as:

...a rifle having one or more barrels less than sixteen inches in length and any weapon made from a rifle (whether by alteration, modification, or otherwise) if such weapon, as modified, has an overall length of less than twenty-six inches.

Shoulder stocks normally attach to the receiver of a shoulder-fired firearm. However, in the case of an AR-15 type, it attaches to the buffer tube. The shoulder stock provides a means for the shooter to support the firearm and easily aim it. You have asked FTB to examine your attached photo—which shows a device attached to the buffer tube that you call a *saddle*—and determine whether the pictured device, if attached to the tube, would reclassify the AR-15 pistol as an SBR. You indicate that the device is made as a "cheek weld" enhancement.

Based on our appraisal of your attached photo, FTB finds that the "saddle" is not designed to support the AR-15 pistol in the shoulder of the shooter during firing, but rather to rest against the shooter's cheek. Consequently, the attachment of the saddle to the AR-15 pistol would not change the pistol's classification to "SBR."

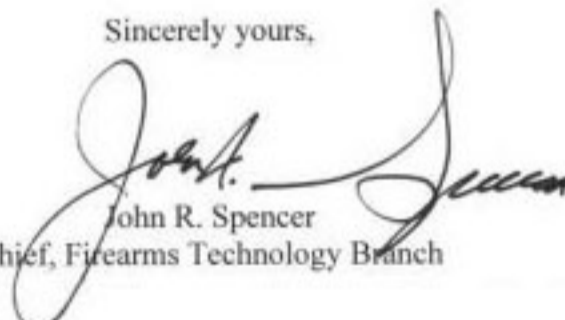
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Mr. John [REDACTED]

We caution that our findings are based on the design depicted in the photo as submitted. If the approved configuration would be changed, these findings would be subject to review.

We thank you for your inquiry and trust the foregoing has been responsive.

Sincerely yours,


John R. Spencer
Chief, Firearms Technology Branch

