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CLARIFICATION REGARDING THE INTEGRATION OF A "SADDLE" AND THORSDEN CUSTOMS BUFFER TUBE COVER FOR USE ON AR PISTOL AND OTHER PISTOL VARIANTS

In a previous submittal for opinion, we asked if our buffer tube cover with cheek rise, when installed on the buffer tube of an AR pistol, would be considered a "shoulder stock" thereby changing the classification from "pistol" to "short barreled rifle" (Exhibit A, page 3, Q5). The answer provided was that it would not.

On September 5, 2011, BATFE Technology Branch responded to a question regarding the use of a "saddle" installed on the buffer tube of an AR pistol and whether its use would be considered a "shoulder stock" thereby changing the classification from "pistol" to "short barreled rifle" (Exhibit B). The answer provided was that it would not, but with the caveat quoted below.

"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."

For review and opinion as prescribed in (Exhibit B), I would like to submit three sample Buffer Tube Cover- saddle combinations. Each sample is described in detail below.

We have examined the configuration in the sample picture provided to BATFE in (Exhibit B) and it has proven to be unreliable. The substrate (a bare tube) under the saddle does not provide the necessary support or attachment points necessary for the saddle to be secured solidly. It can rotate and/or slide under the user's cheek which may create a safety hazard.

We have developed an assembly that incorporates both of the previously approved configurations. Small adapter parts are utilized to make a mechanical connection between them. The new configuration adds a stable substrate beneath the saddle making handling safer and more reliable (FIG 1). We believe that the provided configurations do not alter the original manufactures intent of the saddle types as cheek weld enhancements, nor does it alter the use of a saddle as a cheek weld enhancement on an AR pistol variant as described in (Exhibit B).

Samples:

Sample 1: A complete assembly, including our Enhanced Buffer Tube Cover, saddle type “A”, and adapter parts assembled onto a keyed buffer tube. It incorporates all of the original mounting blocks and hardware that come with saddle type “A”.

Sample 2: A complete assembly, including our Enhanced Buffer Tube Cover, saddle type “A”, and adapter parts assembled onto a longer round buffer tube. It incorporates an improved mounting bracket that provides a more robust mounting point for the saddle.

Sample 3: A complete assembly, including our Standard Buffer Tube Cover, saddle type “B”, and adapter parts assembled onto a keyed buffer tube. It incorporates all of the original mounting blocks and hardware that come with saddle type “B”.

Please note:

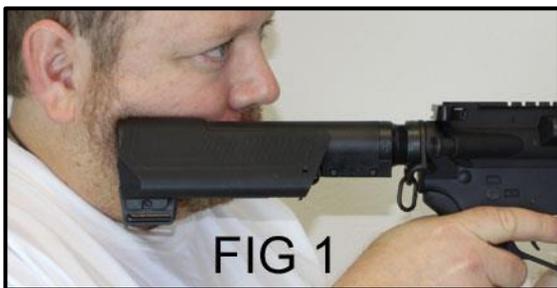
Saddle type A and B are interchangeable with the improved mounting bracket and either of the two Buffer Tube Cover styles.

Q1: Does the addition of a stable substrate (Buffer Tube Cover and adapters) allow an AR pistol with a saddle attached to retain its classification as a “pistol”?

Q2: To provide proper positioning of the cheek rest for users of differing statures (i.e. tall vs short). Would the use of extension tubes or spacers of varying profile and/or length (as demonstrated in the samples and FIG 1) also allow an AR pistol with a saddle attached retain the classification of “pistol”?

Some AR pistol variants, as well as other pistol style firearms do not require a receiver extension or buffered recoil system in order for the action to function (FIG 2).

Q3: Would the use of a receiver extension (buffer tube) paired with one of our buffer tube covers or saddle combinations, for the purpose of providing a stable cheek weld and safer handling, be permissible on pistol variants that do not require a buffered recoil system in order for the action to function?



Thank you for considering our questions. We look forward to your response.

Alan Thordsen (President)